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Transcript Exhibit(s)

Docket #(s): W-02860A-06-0002

W-02860A-05-0727

Exhibit #: A1, A2, S1-S-4

Arizona Corporation Commission

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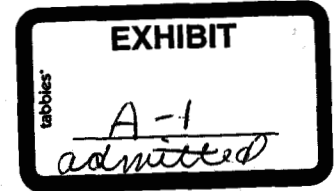
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Naco Water Company, LLC
PO Box 85160
Tucson, AZ 85754
520-623-5172

October 2, 2006

Arizona Corporation Commission
Utilities Division
Docket Control
1200 West Washington Street
Phoenix, Arizona 85007



Re: Docket No. W-02860A-06-0002

This correspondence will serve to document the response of Naco Water Company, LLC (NWC) to Arizona Corporation Commission (ACC) staff direct testimony filed on September 1, 2-6 regarding ACC Docket # W-02860A-06-0002.

Please be advised that it is the unequivocal opinion of NWC that a rate increase which only authorizes a \$450,000.00 Water Infrastructure Finance Authority (WIFA) loan is completely insufficient to address the ongoing and worsening drinking water supply condition within the NWC system.

MULTIPLE RATE INCREASE APPLICATIONS ARE NOT NECESSARY

Additionally, we feel it is not cost effective for this already financially-troubled company to file multiple new finance and rate applications for each phase of the required future system upgrade construction. NWC believes our customers and our company will be much better served if ACC approves a rate increase order stating that when one phase of system upgrade construction is complete, an additional system user surcharge would be authorized to then finance the next phase of required system upgrade construction, at some future certain date prescribed by the ACC.

Please note that this rate increase structuring concept was in-fact the specific suggestion made by Staff during a meeting held at ACC offices on 12 April 2006. During that meeting with ACC staff and WIFA staff, ACC staff specifically directed NWC to prepare one rate increase and finance application which contained ALL required system upgrade construction. ACC staff also indicated that ACC staff would provide recommendations to the ACC for the timing and formula regarding amounts of those future system user rate increases to be phased-in over time

Please understand that it was only at the specific recommendation of ACC staff that NWC incurred the significant expense associated with preparing a comprehensive system upgrade construction cost estimate and rate increase application. It appears as if ACC staff has provided direct testimony which contradicts their previous direction to NWC. When and how will NWC ever recapture the value lost in preparing the comprehensive cost estimate and rate increase application which ACC staff previously directed but now rejects?

PHELPS DODGE FINANCIAL SETTLEMENT HAS NO CERTITUDE

Within its direct testimony, ACC staff assumes that Phelps Dodge Corporation will provide financial assistance to help NWC mitigate groundwater contamination impacts associated with Phelps Dodge mine tailing pile. ACC staff has made these assumptions despite the fact that Phelps Dodge has never at any time made a legally binding commitment to provide this financial assistance; and Phelps Dodge may possibly never contribute any financial assistance to NWC. Under such a scenario problems within the NWC system will continue to worsen to the point when some customers will be without water in the very near future.

As we have stated before, if Phelps Dodge does indeed contribute financial assistance to replace or deepen contaminated supply wells, or to replace distribution lines required to relocate contaminated wells, NWC would in-turn not borrow funds from WIFA to replace threatened drinking water supply wells. Because WIFA only requires repayment of funds actually borrowed, and there would be no need for further rate increases to repay WIFA loans associated with relocating contaminated wells, those potential rate increases could then be forfeited.

HYDROGEOLOGIC ASSESSMENT IMPERATIVE FOR PHELPS DODGE SETTLEMENT

It is absolutely imperative, under any scenario, that the ACC approve a rate increase which will fund completion of the Southern Upper San Pedro River Hydrogeologic Assessment (SUSPRHA). ACC staff has testified against funding the SUSPRHA within the recommended rate increase. (Engineering direct testimony Exhibit 1, page 16)

The SUSPRHA is absolutely essential to NWC if it is ever going to enter into fair and equitable negotiations with Phelps Dodge. The SUSPRHA will provide the first comprehensive independent assessment NWC has ever made regarding the impacts of Phelps Dodge groundwater contamination; and the SUSPRHA is absolutely essential to determining *if and where*, NWC might hope to relocate its impacted drinking water supply wells.

Without the SUSPRHA, NWC cannot even begin to negotiate settlement with Phelps Dodge. This will in-turn cause more eventual cost increases to NWC and its system users; and will completely invalidate ACC staff assumptions regarding a Phelps Dodge financial settlement.

In short, ACC staff cannot base its rate increase recommendations on the assumption that Phelps Dodge will reach a financial settlement with NWC, while at the same time denying NWC the very tools it requires to reach that financial settlement.

NWC urges the Commission to approve a rate increase order stating that costs associated with the SUSPRHA are to be included in the total WIFA funding package finally approved for NWC.

ACC DEBT AUTHORIZATION IS NOT CONSISTENT WITH WIFA LENDING

ACC staff has recommended a rate increase which supports a \$450,000 WIFA loan, and an additional \$300,000 WIFA loan if WIFA commits to a zero interest rate. Beside the fact that this potential \$750,000 WIFA loan financing is still much less than the amount that will ultimately be required to complete the entire system upgrade project, WIFA will not commit to loaning any funds at any interest rate until the total amount of financing is approved by the Commission. After approval of the entire \$750,000 (\$450,000 plus \$300,000) the application will be taken to the Board at WIFA and only then can the negotiations for lower interest rates be reviewed.

WIFA has in place rules for special circumstances such as deprived areas, of which Naco certainly is, which may qualify for low or zero percent interest loans (See attached Exhibit A). But, once again, the WIFA Board will not commit to any interest rate before it receives Commission approval of the total amount to be financed.

ACC rules require ACC approval before a privately held water system can receive any WIFA loan financing. Therefore, how can we negotiate a WIFA loan rate without first having ACC approval?

Furthermore, WIFA lending rules only require a debt service coverage (DSC ratio of 1.20 to facilitate WIFA lending, yet Staff appears to be imposing the standard upon NWC to maintain a DSC ratio of 1.53 (Staff direct testimony page 14, line 1). Why is Staff imposing a higher DSC ratio upon NWC than that which is actually required by the lender who will be providing financing to NWC?

NWC urges the Commission to approve a rate increase order stating that WIFA can loan any funds to NWC at the interest rate WIFA chooses, so long as the DSC ratio meets WIFA's lending requirements of a DSC ratio equal to 1.20 with the total loan amount and lending rate to be determined by WIFA based upon achieving a 1.20 DSC ratio.

Letter to ACC Utility Division Docket Control
Re: Docket No. W-02860A-06-0002 (dated Oct. 2, 2006)

PHYSICAL PLANT DEPRECIATION ISSUES

In regard to amounts removed from plant and depreciation by Staff (page 4, Item 16), we would like to interject that Well #3 was drilled in 1930 according to Arizona Department of Water Resources records.

It is reported that Staff adjusted the plant value according to the Handy-Whitman Index to calculate the cost of drilling the well in 1950.

Well #3 was purchased as part of a land purchase and we have no record of this ever being put into the plant account.

Also, the old Well #4 was a leased well from the Southern Pacific Railroad June 8, 1964. The well was never put into plant therefore cannot be taken out as NWC did not own the well.

Well #5, though drilled in 1960, was also purchased with a piece of land by Mr. Salim Dominguez, Sr. in 1969. As before, we have no record of this purchased land ever being put into plant.

Thanks you for your time and consideration in these matters. If you should have any questions, or require any additional information, please feel free to contact me at (520)623-5172.

Regards;

Bonnie O'Connor
For
Salim S. Dominguez, Jr.
Owner - Naco Water Company LLC

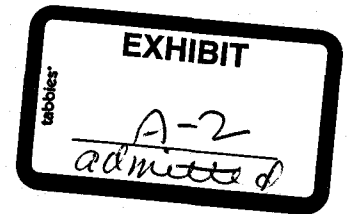
cc: Salim S. Dominguez, Jr.



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Arizona Corporation Commission
Utilities Division
Docket Control
1200 West Washington Street
Phoenix, Arizona 85007

2006 NOV - 11 P 4: 11

31 October 2006

AZ CORP COMMISSION
DOCUMENT CONTROL

Re: ACC Docket No. W-02860A-06-0002
ACC Docket No. W-02860A-05-0727

NOV - 3 2006

This correspondence will serve to document the response of Naco Water Company, LLC (NWC) to Arizona Corporation Commission (ACC) staff surrebuttal testimony filed on 23 October 2006 regarding ACC Docket # W-02860A-06-0002 and Docket # W-02860A-05-0727.

Specifically, this correspondence will address testimony submitted by Ms. Dorothy Hains regarding the Southern Upper San Pedro River Hydrogeologic Assessment (SUSPRHA) required to begin negotiations with Phelps Dodge Corporation.

In summary, Ms. Hains has correctly identified the general scope a hydrogeologic assessment (page 1, lines 16-23), as well as the imperative need for completion of the SUSPRHA (page 2, lines 10-17). However, Ms. Hains has completely mis-stated facts used to justify her opinion that the ACC should not approve a rate increase sufficient to fund the SUSPRHA (page 2, lines 19-26).

Furthermore, as NWC has repeatedly stated before ACC staff, within its written testimony, and within its staff rebuttal written testimony, a rate increase which only authorizes a \$450,000 Water Infrastructure Finance Authority (WIFA) loan is completely insufficient to address the ongoing and worsening drinking water supply conditions within the NWC system.

Nonetheless, Ms Hains has for reasons of her own, apparently chosen to ignore these immediate and overwhelming water supply issues. Instead, Ms. Hains has chosen to focus all her efforts in this rate increase and financing approval application exclusively on resolving water loss issues; but she has chosen to do so in a manner which does not comprehensively address the water loss issues, and which completely ignores the overwhelming and immediate drinking water supply conditions within the NWC system.

Please understand it is certainly the position of NWC that system water loss issues are a pressing system operation issue, and one which should be addressed as soon as possible. But also please understand that if the water supply issues are not simultaneously addressed, there will be no water loss problems to address because: **THE SYSTEM WILL NOT HAVE WATER SUPPLIES TO DISTRIBUTE.**

Obviously this situation begs for a witty analogy like the chicken and egg concept, except for the fact that the issue at hand is far too serious: the viability of drinking water supplies for NWC system users. Frankly, the apparent lack of concern Ms. Hains has demonstrated for the health and welfare of NWC system users is staggering. Furthermore, it is somewhat appalling that our system of regulating and financing Arizona's most vital rural drinking water systems appears to be managed so cavalierly.

The rationale Ms. Hains has chosen to approve some water loss elimination projects, while excluding other water loss elimination projects from this WIFA financing package, appears to be a function of the final financing amount recommended by ACC staff. Generally speaking, NWC would agree with Ms. Hains in that the most significant water losses should be addressed first, and that less significant water losses addressed in a future rate increase application, or through improved system revenues.

However, nowhere in Ms. Hains' logic system does she account for the fact that the system will very soon run out of water supplies in the Bisbee Junction area. As Ms. Hains knows well, NWC has been forced to truck water into the Bisbee Junction area for each of the past two summers, and water supply issues are only getting worse.

Consequently, NWC cannot support Ms. Hains logic to completely exclude water supply issues from this financing application for the simple fact that if there are no water supplies to distribute, there will be no water losses to address. Obviously, water supply issues are more pressing than water loss issues.

Apparently, Ms. Hains is trying to justify her failure to address the water supply issues on the basis of:

- 1.) the water supply issues will all be resolved under a pending settlement with the Phelps Dodge Corporation;
- 2.) the proposed SUSPRHA "will be extremely expensive";
- 3.) there are other water providers within the SUSPRHA study area which should share in the cost of the SUSPRHA;
- 4.) the fact that Phelps Dodge Corporation should pay for the cost of the SUSPRHA;
- 5.) the SUSPRHA should be conducted after the water loss issues are addressed.



PHELPS DODGE FINANCIAL SETTLEMENT HAS NO CERTITUDE

Within its direct and surrebuttal testimony, Ms. Hains assumes that Phelps Dodge Corporation will provide financial assistance to help NWC mitigate groundwater contamination impacts associated with Phelps Dodge mine tailing pile. ACC staff has made these assumptions despite the fact that Phelps Dodge has never at any time made a legally binding commitment to provide this financial assistance; and Phelps Dodge may possibly never contribute any financial assistance to NWC. Under such a scenario, water supply problems within the NWC system will continue to worsen to the point where some customers will be without drinking water in the very near future.

To assume that the already financially cash-strapped NWC system will be able finance a legally-binding financial settlement with a company the size of Phelps Dodge also assumes that Phelps Dodge will have no objections to the financial remedies sought by NWC. Even the slightest objections from Phelps Dodge will precipitate an expenditure of legal fees which the NWC simply cannot fund.

Therefore, assuming that any financial settlement with Phelps Dodge is imminent or pending may be a prerogative that Ms. Hains is willing to take. But it certainly not the type of cavalier water system management that NWC could ever provide to its system users. NWC simply cannot rely upon any financial settlement until such time as a legally-binding agreement is executed with Phelps Dodge Corporation.

Nonetheless, as NWC has repeatedly stated before ACC staff, within its written testimony, and within its staff rebuttal written testimony, if Phelps Dodge does indeed contribute financial assistance to replace or deepen contaminated supply wells, or to replace distribution lines required to relocate contaminated wells, NWC would in-turn not borrow funds from WIFA to replace threatened drinking water supply wells. Because WIFA only requires repayment of funds actually borrowed, and there would be no need for further rate increases to repay WIFA loans associated with relocating contaminated wells, those potential rate increases could then be forfeited.

SUSPRHA WILL NOT BE "EXTREMELY EXPENSIVE"

Ms. Hains' testimony indicates that the SUSPRHA "will be extremely expensive", because it will cover approximately 1,225 square miles spread over two countries. Ms. Hains has provided this testimony despite the fact that she has never requested, or has she ever been provided, a scope of work for the proposed SUSPRHA.

If she had requested a copy of the SUSPRHA work scope, she would have seen that the proposed study covers 36 square miles within southern Cochise county only; and that the SUSPRHA does not cover 1,225 square miles spread over two countries. The 36 square mile SUSPRHA study area coincides with the same geographic area delineated by the NWC Certificate of Convenience & Necessity (CC&N) area approved by the ACC.



Obviously, it would not be cost effective or professionally responsible to study the 1,225 square mile area spread over two countries which Ms. Hains identifies - especially since NWC is only authorized to operate within approximately 18 square miles in southern Cochise County. The proposed SUSPRHA study area only includes those areas contained within the NWC CC&N, and those areas immediately adjacent to the NWC CC&N area.

Furthermore, it is inconceivable why Ms. Hains would testify that the SUSPRHA "will be extremely expensive", when she knows full well that the cost of the SUSPRHA was proposed at less than \$75,000 in the above referenced ACC finance approval application. While \$75,000 is certainly no small sum of money, it is important to note that this cost was proposed within the context of a \$2,457,118 preliminary cost estimate for all required system work. Obviously, asking the NWC system users to finance \$75,000 (3%) of a total \$2,457,118 in required system upgrade work, would not generally meet the definition of "extremely expensive".

NWC IS THE ONLY IMPACTED WATER PROVIDER IN THE SUSPRHA

Ms. Hains testified that "Naco Water Company is not the only water provider in the SUSPRHA study area." While it is correct that the Arizona Water Company (AWC) does operate a wellfield within the western portion of the SUSPRHA, AWC supply wells are not impacted by the Phelps Dodge groundwater contaminant plume.

In fact, AWC wells are located within the most likely area for new NWC supply wells to be installed. And since AWC and NWC will then ultimately be competing for the same groundwater resources, why would AWC have any incentive to assist NWC in preparing the SUSPRHA which will then be used to justify the installation of NWC supply wells?? And, even if we could look past the failed business logic of AWC paying for a portion of the SUSPRHA, there is no legal authority under which NWC could ever compel AWC to pay any portion of the SUSPRHA.

In summary, there are no other water providers within the SUSPRHA study area impacted by the Phelps Dodge groundwater contaminant plume, and there is no legal authority under which NWC could ever compel any other water provider to pay any portion of the SUSPRHA. In short, it appears as if Ms. Hains is trying to divert attention away from the absolutely pressing need for the SUSPRHA by asserting a series of non-sequiturs with respect to other water providers.

WHEN SHOULD PHELPS DODGE PAY COST FOR SUSPRHA

While NWC does not argue with Ms. Hains opinion that Phelps Dodge should pay for all of the SUSPRHA, there are obvious limitations relating to timing of any possible payment which apparently escapes Ms. Hains.



Firstly, what if Phelps Dodge never reaches agreement with NWC?? When and how would Phelps Dodge ever pay for the SUSPRHA??

Secondly, Ms. Hains appears to not understand the process involved in reaching a legal settlement between any two aggrieved parties. Before NWC can reach any legal settlement with Phelps Dodge, NWC must first determine what compensation it seeks from Phelps Dodge.

The SUSPRHA is that tool with which the NWC will determine where to place its new water supply wells so as to avoid future impacts from the Phelps Dodge groundwater contaminant plume (Ms. Hains testimony, page 1, lines 22-23). Consequently, the SUSPRHA will then be used by NWC to determine what compensation it seeks from Phelps Dodge. Ms. Hains correctly expects Phelps Dodge to pay for the SUSPRHA, but she ignores the fact that NWC must first complete the SUSPRHA so it can reach a legally binding settlement with Phelps Dodge, under which Phelps Dodge will then pay for the SUSPRHA.

The SUSPRHA is absolutely essential to NWC if it is ever going to enter into fair and equitable negotiations with Phelps Dodge. The SUSPRHA will provide the first comprehensive independent assessment NWC has ever made regarding the impacts of Phelps Dodge groundwater contamination; and the SUSPRHA is absolutely essential to determining if and where NWC might hope to relocate its impacted water supply wells.

Without the SUSPRHA, NWC cannot even begin to negotiate settlement with Phelps Dodge. This will in-turn cause more eventual cost increases to NWC and its system users; and will completely invalidate ACC staff assumptions regarding a Phelps Dodge financial settlement.

NWC must first pay to complete the SUSPRHA so that it has a valid technical basis upon which it can reach a legally-binding settlement with Phelps Dodge. NWC will then of course insist that Phelps Dodge reimburse the SUSPRHA cost as part of any final settlement.

Ms. Hains solution to financing the SUSPRHA would be akin to this scenario:

You are involved in a terrible automobile accident and severely injured when another motorist runs a red light and crashes into your vehicle. By running the red light, the other motorist is clearly at fault, and his automobile insurance company will ultimately be responsible to cover all your costs. But upon your arrival at the hospital, your health insurance company advises you that they won't pay for your health care today because ultimately the other driver's automobile insurance company will pay for you to go to the hospital at some date in the future. Even though the logic is flawed, you may still die waiting for the automobile insurance company to settle.



NWC is asking the ACC to step-up today, authorize a WIFA loan today which will pay for the work NWC needs today, so that NWC can ultimately reach a beneficial settlement with Phelps Dodge tomorrow. NWC urges the ACC to approve a rate increase order stating that costs associated with the SUSPRHA are to be included in the total WIFA funding package finally approved for NWC.

SUSPRHA SHOULD NOT WAIT UNTIL WATER LOSS ISSUES ARE RESOLVED

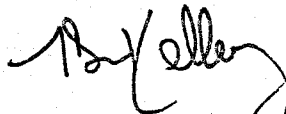
To reiterate the position of NWC with respect to Ms. Hains' recommendation of waiting until the water loss issues are resolved to begin work on the SUSPRHA; NWC cannot support Ms. Hains logic to exclude the SUSPRHA work from this financing application for the simple fact that if there are no water supplies to distribute, there will be no water losses to address. Obviously, water supply issues are more pressing than water loss issues.

In summary, ACC staff cannot base its rate increase recommendations upon the assumption that Phelps Dodge will reach a financial settlement with NWC, while at the same time denying NWC the very tools which it requires to reach that financial settlement. The SUSPRHA is absolutely essential to NWC if it is ever going to enter into fair and equitable negotiations with Phelps Dodge.

Likewise, ACC staff cannot blindly concentrate its regulatory efforts and approval on eliminating distribution system water losses, without first ensuring that the system will have water to distribute.

Thank you for your time and consideration in these matters. If you should have any questions, or require any additional information, please feel free to contact me at (602) 864-3887.

Sincerely,



J. Dan Kelley, P.E.
on behalf of Naco Water Company

cc: Mr. Salim S. Dominguez, Jr. - NWC
Ms. Bonnie O'Connor - SWUM





TIERRA DYNAMIC CO.

Integrated Environmental ServicesSM

Post Office Box 35188

Phoenix, Arizona 85069

(602) 864-3887

TELEFAX MESSAGE

To: Bonnie O'Connor - Southwestern Utility Management
FAX : (520) 792-0377

From: J. Dan Kelley, P.E. *(Signature)*
FAX : (602) 864-3990

Date: 2 Nov 2006

Topic: Rebuttal of D. Hains ACC Testimony

Message: Good Morning Bonnie -

Please take a look at the letter I submitted yesterday to the ACC in response to Dorothy Hains' surrebuttal testimony for the pending finance approval application. I will be sending the hard copy down today for your files.

Please take a moment to review this letter, and then let's discuss on Friday morning. Please remember that I will be in NM next week, and won't be able to participate in the oral testimony before the OAH down in Tucson. So, I want to make sure you can carry my water (pun intended) during the OAH Hearing next week.

Thanks!

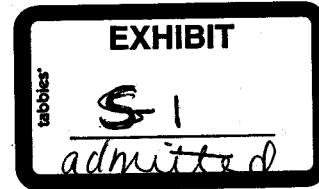
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BEFORE THE ARIZONA CORPORATION COMMISSION

JEFF HATCH-MILLER
Chairman
WILLIAM A. MUNDELL
Commissioner
BARRY WONG
Commissioner
MIKE GLEASON
Commissioner
KRISTIN K. MAYES
Commissioner



IN THE MATTER OF THE APPLICATION OF)	DOCKET NO. W-02860A-06-0002
NACO WATER COMPANY,)	DOCKET NO. W-02860A-05-0727
AN ARIZONA CORPORATION, FOR A RATE)	
<u>INCREASE & FINANCING</u>)	

DIRECT TESTIMONY

OF

DOROTHY HAINS

UTILITIES ENGINEER

UTILITIES DIVISION

September 1, 2006

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INTRODUCTION

Q. Please state your name and business address.

A. My name is Dorothy Hains. My business address is 1200 West Washington Street, Phoenix, Arizona 85007.

Q. By whom and in what position are you employed?

A. I am employed by the Arizona Corporation Commission ("Commission" "ACC") as a Utilities Engineer - Water/Wastewater in the Utilities Division.

Q. How long have you been employed by the Commission?

A. I have been employed by the Commission since January 1998.

Q. What are your responsibilities as a Utilities Engineer - Water/Wastewater?

A. My main responsibilities are to inspect, investigate and evaluate water and wastewater systems. This includes obtaining data, preparing reconstruction cost new and/or original cost studies, cost of service studies and investigative reports, interpreting rules and regulations, and to suggest corrective action and provide technical recommendations on water and wastewater system deficiencies. I also provide written and oral testimony in rate cases and other cases before the Commission.

Q. How many companies have you analyzed for the Utilities Division?

A. I have analyzed more than 90 companies covering these various responsibilities for Utilities Division Staff ("Staff").

Q. Have you previously testified before this Commission?

A. Yes, I have testified before this Commission.

1 **Q. What is your educational background?**

2 A. I graduated from Alabama University in Birmingham in 1987 with a Bachelor of Science
3 degree in Civil Engineering.
4

5 **Q. Briefly describe your pertinent work experience.**

6 A. Before my employment with the Commission, I was an Environmental Engineer for the
7 Arizona Department of Environmental Quality, for ten years. Prior to that time, I was an
8 Engineering Technician with C. F. Hains, Hydrology in Northport, Alabama for
9 approximately five years.
10

11 **Q. Please state your professional membership, registrations, and licenses.**

12 A. I am a member of the American Society of Civil Engineering ("ASCE") and American
13 Water Works Association ("AWWA"). I am a registered Civil Engineer in Arizona.
14

15 **PURPOSE OF TESTIMONY**

16 **Q. What was your assignment in this rate and financing proceeding?**

17 A. My assignment was to provide Staff's engineering evaluation of the Naco Water Company
18 ("Naco" or "Company").
19

20 **Q. What is the purpose of your testimony in this proceeding?**

21 A. To present the findings of Staff's engineering evaluation of Naco's operation. Those
22 findings are contained in the Engineering Report that I have prepared for this proceeding.
23 This report is included as Exhibit-1, in this pre-filed testimony.
24

ENGINEERING REPORT

Q. Would you briefly describe what was involved in preparing the Engineering Report for the Naco water operation in this proceeding?

A. After reviewing Naco's rate and financing applications, I physically inspected the water system to evaluate its operations and to determine which plant items were or were not used and useful. I contacted the Arizona Department of Environmental Quality ("ADEQ") to determine if the system was in compliance with ADEQ requirements. I obtained information from Naco regarding water testing and water usage and analyzed that information. Based on this data, I made my evaluations and prepared the Engineering Report attached as Exhibit 1.

Q. Please describe the information contained in Exhibit 1.

A. Exhibit 1 is the Engineering Report for Naco's operation. This Report is divided into three general sections: 1) *Executive Summary*; 2) *Engineering Report Discussion*, and 3) *Engineering Report Exhibits*. The *Discussions* section can be further divided into twelve subsections: A) Purpose of Report; B) Location of System; C) Description of System; D) Arsenic; E) Water Usage; F) Growth Projection; G) ADEQ Compliance; H) Arizona Department of Water Resources ("ADWR") Compliance; I) Arizona Corporation Commission ("ACC") Compliance; J) Water Testing Expenses; K) Depreciation Rates; L) Financing and M) Other Issues. These subsections provide information about the Naco water systems.

CONCLUSIONS AND RECOMMENDATIONS

Q. What are Staff's conclusions and recommendations regarding Naco's operation?

A. Based upon Staff's engineering evaluation of Naco's operation, Staff concludes the following about the Company:

1) According to the Utilities Division Compliance Section, the Company has no outstanding ACC compliance issues;

2) The Company is not in any ADWR Active Management Area and is in compliance with ADWR monitoring and reporting requirements.

3) ADEQ has determined that Naco is currently delivering water that meets water quality standards required by Arizona Administrative Code, Title 18, Chapter 4.

4) The latest lab analysis provided by the Company indicates that the arsenic levels in the wells used by the Company are below 5µg/l, which is below the new arsenic standards.

5) Staff concludes that the proposed financing projects and the cost estimates as amended by Staff are appropriate and reasonable for purposes of this financing request. However, no "used and useful" determination of the proposed project items were made and no particular treatment should be inferred for rate making or rate base purpose in the future.

Staff's recommends the following eight provisions be part of any Commission order on this application:

1) That the Company use depreciation rates approved by the National Association of Regulatory Utility Commissioners ("NARUC") category, as delineated in Exhibit 6 of the attached report in the future.

2) Staff recommends that the Company take action to resolve the storage deficiencies of Systems PWS # 02-112 and PWS # 02-133 prior to filing its next rate application.

1 3) That the Company's proposed service line and meter installation charges be
2 accepted.

3
4 4) Annual water testing expenses should be adjusted to \$9,830.

5
6 5) Staff recommends that the Company reduce its water loss in PWS #02-024 and
7 PWS #02-112 to 15% or less before filing its next rate application. In addition, concurrent
8 with the Company filing its next rate application, it must file a plan to reduce its water loss
9 to 10% or less. If the Company finds that the reduction in water loss to less than 10% is
10 not cost-effective, the Company shall submit, before filing its next rate application, a
11 detailed cost analysis and explanation demonstrating why water loss reduction to 10% or
12 less is not cost effective.

13
14 6) The ultimate financing amount recommended by Staff will be dependant upon
15 Staff's financial analysis. In the event the amount recommended in Staff's financial
16 analysis is not sufficient to complete all the water loss related projects, Staff recommends
17 that the Naco Town System – Service Line Connection and Bisbee Junction System –
18 Replace Main on Bisbee Junction Road projects be given first priority. Any remaining
19 funds should be applied to addressing the most serious water loss issues in the Bisbee
20 Junction System – Distribution Piping project.

21
22 Staff further recommends that the Company file for Staff's review and certification within
23 30 days of the effective date of the order, as a compliance items in this docket, a list of
24 projects that it proposes to undertake using the debt authorization amount ultimately
25 approved in this matter. Staff further recommends that when preparing the above list the

1 Company shall give priority to projects that are the most effective and cost efficient in
2 addressing the water loss issue.

3
4 7) Staff recommends a rate base adjustment totaling \$12,991 to account for the plant
5 removed from service.

6
7 **Q. Does this conclude your pre-filed testimony?**

8 **A. Yes, it does.**

EXHIBIT 1

ENGINEERING REPORT FOR NACO WATER COMPANY

BY DOROTHY HAINS

SEPTEMBER 1, 2006

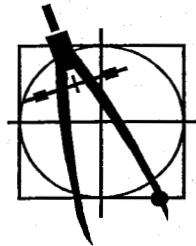


Exhibit 1

**ENGINEERING REPORT
FOR NACO UTILITY COMPANY
By Dorothy Hains, P. E.
Docket No. W-02860A-06-0002 (Rates)
Docket No. W-02860A-05-0727
(Financing)
July 26, 2006**

EXECUTIVE SUMMARY

Recommendations:

1. Staff recommends that the Company take action to resolve the storage deficiencies of Systems PWS # 02-112 and PWS # 02-133 prior to filing its next rate application. (See §C of the report for discussion and details.)
2. Staff recommends that the Company use depreciation rates by individual National Association of Regulatory Utility Commissioners ("NARUC") category, as delineated in Exhibit 6, in the future. These rates should be used to calculate the annual depreciation expense for the Company in this application. (See §K and Exhibit 6 for a discussion and a tabulation of the recommended rates.)
3. Staff recommends approval of meter and service line installation charges as shown in Table 8. (See §M of report for discussion and details.)
4. Water testing expenses are based upon participation in the ADEQ Monitoring Assistance Program ("MAP"). Annual testing expenses should be adjusted to \$9,830. (See §J and Tables 7 and 7A for discussion and details.)
5. Staff recommends that the Company reduce its water loss in PWS #02-024 and PWS #02-112 to 15% or less before filing its next rate application. In addition, concurrent with the Company filing its next rate application, it must file a plan to reduce its water loss to 10% or less. If the Company finds that the reduction in water loss to less than 10% is not cost-effective, the Company shall submit, before filing its next rate application, a detailed cost analysis and explanation demonstrating why water loss

reduction to 10% or less is not cost effective. (See §E of report for discussion and details.)

6. The ultimate financing amount recommended by Staff will be dependant upon Staff's financial analysis. In the event the amount recommended in Staff's financial analysis is not sufficient to complete the water loss related projects, Staff recommends that the Naco Town System – Service Line Connection and Bisbee Junction System – Replace Main on Bisbee Junction Road projects be given first priority. Any remaining funds should be applied to addressing the most serious water loss issues in the Bisbee Junction System – Distribution Piping project.

Staff further recommends that the Company file for Staff's review and certification within 30 days of the effective date of the order, as a compliance item in this docket, a list of projects that it proposes to undertake using the debt authorization amount ultimately approved in this matter. Staff further recommends that when preparing the above list the Company shall give priority to projects that are the most effective and cost efficient in addressing the water loss issue. (See §L of report for discussion and details.)

7. Staff recommends a rate base adjustment totaling \$12,991 to account for the plant removed from service. (See §M of report for discussion and details.)

Conclusions:

1. The most recent lab analysis provided by the Company indicates that the arsenic levels in the wells used by the Company are below 5µg/l, which is below the new arsenic MCL.
2. The Company is not in any Arizona Department of Water Resources ("ADWR") Active Management Area and is not in subject to ADWR monitoring and reporting requirements.
3. According to the Utilities Division Compliance Section, the Company has no outstanding ACC compliance issues.
4. The Company is in compliance with ADEQ water quality standards and delivering water that meets water quality standards required by Arizona Administrative Code, Title 18, Chapter 4. (See §G of report for discussion and details.)
5. Staff concludes that the proposed financing projects and the cost estimates as amended by Staff are appropriate and reasonable for purposes of this financing request. However, no

Naco Water Co.

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“used and useful” determination of the proposed project items were made and no particular treatment should be inferred for rate making or rate base purpose in the future.

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**ENGINEERING REPORT
FOR
NACO UTILITY COMPANY, INC.
DOCKET NO. W-02860A-06-0002 (RATES) &
DOCKET NO. W-02860A-05-0727 (FINANCING)**

A. PURPOSE OF REPORT

This report was prepared in response to the application of Naco Water Company. ("Naco" or "Company") for a rate increase and authorization to incur debt. An inspection and evaluation of the Company's water systems was conducted by Dorothy Hains, Utilities Engineer, in the accompaniment of Steve Siegfried, the Company's Field Manger and Jose Martinez, an on-site field operator, on March 21, 2006.

B. LOCATION OF SYSTEM

The Company is located approximately 5 miles west of the Town of Bisbee Junction, in Cochise County. Attached Exhibits 1 and 2 detail the location of the service area in relation to other Commission regulated companies in Cochise County and in the immediate area. The Company serves an area approximately three square miles in size that includes all or a portion of Sections 10, 11, 14, 15 and 18 of Township 24 South, Range 24 East.

C. DESCRIPTION OF SYSTEM

I. System Description

The Company owns and operates three individual water systems (Naco Town System, Naco Highway System and Bisbee Junction System) that consist of seven well sites. The Company serves approximately 580 metered customers; the majority of which are residential. PWS numbers for each system are PWS #02-024 for Naco Town System, PWS #02-133 for Naco Highway System and PWS #02-112 for Bisbee Junction System. Exhibits 3A, 3B and 3C are schematic drawings of the water systems. A detailed listing of the Company's water system facilities are as follows:

Table 1 Well Data

PWS # 02-	Well Name	ADWR ID No. (55-xxxxxx)	Pump (HP)	Yield (GPM)	Casing Size (in inches) & Depth (in ft)	(Meter Size inches)	Year drilled
024	Well #6	575700	15	182	10"x410'	4	1999

024	Well #2 ¹	627683	10	80	8"x312'	3	1997
133	Well #3 ²	203321	7½	35	8"x252'	2	2004
112	Well #4 ³	627685	15	85	8"x160'	4	1995
			TOTAL:	382			

Notes:

- 1 In 1999, Well No. 2 (DWR No. 55-627683) went dry and the Company drilled a new well to replace the old well in the same year at the same well site.
2. In 2003, Well No. 3 went dry and the Company drilled a new well to replace the old well in the same year at the same well site.
3. In 1999, Well No. 4 went dry and the Company drilled a new well to replace the old well in the same year at the same well site.

Table 1A Plant Not Used and Useful

PWS # 02-	Well Name	ADWR ID No. (55-xxxxxx)	Pump (HP)	Yield (GPM)	Casing Size (in inches) & Depth (in ft)	(Meter Size inches)	Year Abandoned	Year drilled
024	Old Well #2	627683	10	175	8"x210'	3	1999	1959
133	Old Well #3	627684	15	35	8"x160'	N/A	2003	N/A
112	Old Well #4	627685	15	180	8"x379'	N/A	1999	1926
	Well #1 ¹	627682	5	60	8"x215'	1½	1999	1951
	Well #5 ²	627696	N/A	35	10"x175'	N/A	1999	1960
			TOTAL:	485				

Notes:

1. Well #1 site was sold in 1999.
2. All equipment associated with Well #5 has been either discarded or reused in another well system.

Table 2 Storage Tank

Capacity (Gallons)	Quantity	Location
50,000	1	Well Site #6
20,000	1	Well Site #2
20,000	1	Well Site #4
7,500	1	Well Site #3
Total: 97,500 gallons		

Table 3 Distribution Mains

Diameter (inches)	Material	Length (feet)
1	polyvinyl chloride ("PVC")/Steel	6,180
1½	PVC	3,000
2	PVC/ Steel	11,470
2½	PVC	1,100
3	Acrylonitrile-Butadiene Styrene ("ABS")	1,160
4	PVC/ ABS	9,825
6	PVC	13,240

Table 4 Meters

Size (inches)	Quantity
⅝ x ¾	351
¾	N/A
1	5
1½	6
2	5
3 (Comp)	N/A
Total	N/A

II. System Analysis

Two systems (PWS #s 02-133 and 02-112) do not have adequate production or storage capacity to support their existing base of customers. However, the remaining system (PWS #s 02-024), which is the largest system, does have adequate storage capacity. The Company has several options available to it to address this deficiency, e.g. the Company may obtain additional production or storage or it may wish to consider interconnecting the deficient systems with each other or adjacent systems. System # 02-133 serves less than 15 connections and is not expected to experience any growth and to the best of Staff's knowledge the identified deficiency has not resulted in any disruption of service. Therefore, Staff recommends that the Company take action

to resolve the storage deficiencies of System PWS # 02-133 and PWS #02-112 prior to filing its next rate application.

D. ARSENIC

The U.S. Environmental Protection Agency ("EPA") has reduced the arsenic maximum contaminant level ("MCL") in drinking water from 50 micrograms per liter ("µg/l") or parts per billion ("ppb") to 10 µg/l. The most recent lab analysis provided by the Company indicates that the arsenic levels in the wells used by the Company are below 5 µg/l, which is below the new arsenic MCL.

E. WATER USAGE

Tables 5A through 5D summarize water usage in the Company's CC&N area. Exhibits 4A through 4D are graphs that show water consumption data in gallons per day per connection for the combined systems and each individual system for the period of January 2004 through December 2004.

Table 5A Water Usage in Combined Systems

Month	Number of Customers	Water Sold (gallons)	Water pumped (gallons)	Water purchased (gallons)	Daily Average (gal/day/customer)
Jan 05	364	1,973,000	2,605,000	0	175
Feb 05	364	1,701,000	2,194,000	0	167
Mar 05	365	1,822,000	2,152,000	0	161
Apr 05	366	3,004,000	3,424,000	0	274
May 05	366	3,027,000	3,463,000	0	267
Jun 05	366	3,283,000	3,982,000	0	299
Jul 05	366	3,264,000	4,256,000	0	288
Aug 05	366	2,099,000	3,256,000	0	185
Sep 05	366	2,029,000	3,436,000	0	185
Oct 05	366	2,036,000	3,629,000	0	179
Nov 05	366	2,079,000	2,616,000	0	189
Dec 05	366	1,801,000	2,279,000	0	159
Total		28,118,000	37,292,000	0	
Average					211

The calculated overall water loss for the combined systems was 24.6% during the test year.

Table 5B Water Usage in PWS #02-024

Month	Number of Customers	Water Sold (gallons)	Water pumped (gallons)	Water purchased (gallons)	Daily Average (gal/day/customer)
Jan 05	283	1,629,000	1,931,000	0	186
Feb 05	283	1,407,000	1,763,000	0	178
Mar 05	284	1,554,000	1,772,000	0	177
Apr 05	285	2,563,000	2,847,000	0	300
May 05	285	2,493,000	2,751,000	0	282
Jun 05	285	2,615,000	3,147,000	0	306
Jul 05	285	2,553,000	3,310,000	0	289
Aug 05	285	1,727,000	2,690,000	0	195
Sep 05	285	1,649,000	2,729,000	0	193
Oct 05	285	1,682,000	3,078,000	0	190
Nov 05	285	1,625,000	2,117,000	0	190
Dec 05	285	1,408,000	1,810,000	0	159
Total		22,905,000	29,945,000	0	
Average					220

The calculated water loss in PWS #02-024 (Naco Town System) was 23.51% during the test year.

Table 5C Water Usage in PWS #02-112

Month	Number of Customers	Water Sold (gallons)	Water pumped (gallons)	Water purchased (gallons)	Daily Average (gal/day/customer)
Jan 05	71	298,000	628,000	0	135
Feb 05	71	258,000	395,000	0	130
Mar 05	71	235,000	347,000	0	107
Apr 05	71	396,000	531,000	0	186
May 05	71	463,000	641,000	0	210
Jun 05	71	589,000	752,000	0	277
Jul 05	71	631,000	863,000	0	287
Aug 05	71	330,000	523,000	0	150
Sep 05	71	338,000	663,000	0	159
Oct 05	71	317,000	507,000	0	144
Nov 05	71	411,000	455,000	0	193
Dec 05	71	341,000	410,000	0	155
Total		4,607,000	6,715,000	0	
Average					178

The calculated water loss in PWS #02-112 (Bisbee Junction System) was 31.39% during the test year.

Table 5D Water Usage in PWS #02-133

Month	Number of Customers	Water Sold (gallons)	Water pumped (gallons)	Water purchased (gallons)	Daily Average (gal/day/customer)
Jan 05	10	46,000	46,000	0	148
Feb 05	10	36,000	36,000	0	129
Mar 05	10	33,000	33,000	0	106
Apr 05	10	45,000	46,000	0	150
May 05	10	71,000	71,000	0	229
Jun 05	10	79,000	83,000	0	263
Jul 05	10	80,000	83,000	0	258
Aug 05	10	42,000	43,000	0	135
Sep 05	10	42,000	44,000	0	140
Oct 05	10	37,000	44,000	0	119
Nov 05	10	43,000	44,000	0	143
Dec 05	10	52,000	59,000	0	168
Total		606,000	606,000	0	
Average					166

The calculated water loss in PWS #02-133 (Naco Highway System) was 4.11 % during the test year.

I. Water Sold

Based on information provided by the Company, during the test year the Company experienced an overall daily average use of 209 gallons per day ("gpd") per customer, a high use of 299 gpd per customer and a low use of less than 151 gpd per customer. Individually, the calculated highest use is 306 gpd per customer in PWS # 02-024 and the lowest is 106 gpd per customer in PWS #02-133. The highest total monthly use occurred in June, when total of 3,283,000 gallons were sold to 366 customers. The lowest total monthly use occurred in February, when 1,701,000 gallons were sold to 364 customers.

II. Non-account Water

Non-account water should be 10% or less and never more than 15%. It is important to be able to reconcile the difference between water sold and the water produced by the source. A water balance will allow a water company to identify water and revenue losses due to leakage, theft, and flushing. Overall non-account water for the Company was calculated to be 24.6 percent during the test year, which exceeds acceptable limits. It appears that all systems except PWS #02-133 have water loss exceeding the acceptable limits. Therefore, Staff recommends that the Company reduce its water loss in PWS #02-024 and PWS #02-112 to 15% or less before filing its next rate application. In addition, concurrent with the Company filing its next rate application, it must file a plan to reduce its water loss to 10% or less. If the Company finds that

the reduction in water loss to less than 10% is not cost-effective, the Company shall submit, before filing its next rate application, a detailed cost analysis and explanation demonstrating why water loss reduction to 10% or less is not cost effective.

F. GROWTH PROJECTION

Based on the service meter data contained in the Company's annual reports, the number of customers increased from 310 at the end of 1994 to 366 by the end of 2005, with an average growth rate of 5 customers per year. Based on the linear regression analysis, the Company could have approximately 413 customers by the end of 2011. The following table summarizes actual and projected growth in the Company's existing certificated service area.

Table 6 Actual and Projected Growth

Year	Nos. of Customers	
1994	310	Reported
1995	303	Reported
1996	316	Reported
1997	337	Reported
1998	344	Reported
1999	349	Reported
2000	349	Reported
2001	356	Reported
2002	359	Reported
2003	362	Reported
2004	364	Reported
2005	366	Reported
2006	368	Estimated
2007	374	Estimated
2008	380	Estimated
2009	385	Estimated
2010	391	Estimated
2011	413	Estimated

G. ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY ("ADEQ") COMPLIANCE

Staff received compliance status reports from ADEQ dated November 8, 2005, in which ADEQ stated that the systems (PWS #02-024 and 02-112) have no major deficiencies. ADEQ has determined that these systems are currently delivering water that meets the water quality standards required by Arizona Administrative Code, Title 18, Chapter 4. System PWS #02-133, which is classified as a semi-public system because of its small number of connections, is not yet regulated by ADEQ.

H. ARIZONA DEPARTMENT OF WATER RESOURCES ("ADWR") COMPLIANCE

Naco Water Company is not in any ADWR Active Management Area. Therefore, the Company is not required to comply with ADWR's monitoring and reporting requirements.

I. ARIZONA CORPORATION COMMISSION ("ACC") COMPLIANCE

According to the Utilities Division Compliance Section, the Company has no outstanding ACC compliance issues.

J. WATER TESTING EXPENSES

Naco is subject to mandatory participation in the ADEQ Monitoring Assistance Program ("MAP"). Staff calculated the testing costs based on the following assumptions:

1. MAP will do baseline testing on everything except copper, lead, nitrates, and bacteria.
2. ADEQ testing is performed in 3-year compliance cycles. Therefore, monitoring costs are estimated for a 3-year compliance period and then presented as a pro forma expense on an annualized basis.
3. MAP fees were calculated from the ADEQ MAP rules.
4. All monitoring expenses are based on Staff's best knowledge of lab costs and methodology and two points of entry.
5. The estimated water testing expenses represent a minimum cost based on no "hits" other than lead and copper, and assume compositing of well samples. If any constituents were found, then the testing costs would dramatically increase.

Tables 7 and 7A show the estimated annual monitoring expense, assuming participation in the MAP program. Water testing expenses should be adjusted to the annual expense amount shown in Tables 7 and 7A, which totals \$ 9,830.

Table 7 Water Testing Cost

Monitoring (Tests per 3 years, unless noted.)	Cost per test	No. of tests per 3 years		Total 3 year cost (\$)		Annual ¹ Cost (\$)
PWS # 02-		024	112	024	112	

Bacteriological – monthly	\$25	72	36	1,800	900	900
Inorganics (& secondary)	\$300	1	1	300	300	200
Radiochemical – (1/ 4 yr)	\$60					MAP
IOC's, SOC's, VOC's						MAP
Nitrites	\$20					MAP
Nitrates – annual	\$40	72	36	2,880	1,440	1,440
Asbestos – per 9 years	\$180					MAP
Lead & Copper – annual	\$45	30	15	1,350	675	675
TTHM	\$150	3	³	450	450	300
HAAS	\$250	3	³	750	750	500
MAP fees (annual)						1,414.92
Total						5,430

Note

- #1: The Costs are combination of expenses for System (PWS #02-112) and System (PWS #02-024).
#2: The 2005 MAP invoice for System (PWS #02-112) was \$432.47 and invoice for System (PWS #02-024) was \$982.45.

Table 7A Water Testing Cost for System #02-133

Monitoring – 3 wells (Tests per 3 years, unless noted.)	Cost per test	No. of tests per three year period	Total cost per three year period	Annual Cost
PWS #02-133				
Bacteriological – monthly	\$25	36	\$900	\$300
Inorganics (& secondary)	\$300	3	\$900	\$300
Radiochemical – (1/ 4 yr)	\$60	$\frac{3}{4}$	\$45	\$15
IOC's, SOC's, VOC's	\$2,805	3	\$8,415	\$2,805
Nitrites	\$20	3	\$60	\$20
Nitrates – annual	\$40	3	\$120	\$40
Asbestos – per 9 years	\$180	$\frac{1}{3}$	\$60	\$20
Lead & Copper – annual	\$45	15	\$675	\$225
TTHM	\$150	3	\$450	\$150
HAAS	\$250	3	\$750	\$250
MAP fees (annual)				\$275.70 ¹
Total				\$4,400

Note

- #1 MAP Annual Sampling Fee formula is: \$250 + # of connections x \$2.57.

The total estimated annual water testing cost is \$9,830 (the sum of \$5,430 plus \$4,400).

K. DEPRECIATION RATES

Staff has developed typical and customary depreciation rates within the range of anticipated equipment life. These rates are presented in Exhibit 6, and should be used to calculate the annual depreciation expense for the Company in this application. It is also recommended that the Company use depreciation rates by individual National Association of Regulatory Utility Commissioners ("NARUC") category, as delineated in Exhibit 6, in the future.

L. FINANCING

The Company is requesting approval to incur debt in the amount of \$2,457,119 which would be used to pay for well renovations, new well installations, well abandonment, main extensions, distribution extensions and service line installation. As previously discussed, the Company has a serious water loss problem which the Company plans to address with this financing. Also, a sulfate pollutant plume is threatening groundwater supplies in the area of the Company's well located near Bisbee Junction. The Company included funding to address this issue as well. Finally, the Company included funds to cover well site improvements and well abandonment at several of its well sites. Because it is unlikely that the Company will be able to afford to undertake all of the projects included in its request, Staff has separated and listed the projects in three separate tables. Each table is labeled to correspond to one of the general need categories described above. Staff's recommendation is listed in the right-hand column. Staff agrees with the Company that water loss reduction projects should be the first priority. Since negotiations with Phelps Dodge are currently underway which may result in the mining company paying for a significant portion of the required groundwater remediation related projects, Staff is recommending that these projects not be funded at this time. While some level of funding could be needed in the future, Staff believes that it is likely that Phelps Dodge will ultimately agree to pay for at least some of the related expense. The well site improvements are a low priority at this time with a couple of minor exceptions.

The ultimate financing amount recommended by Staff will be dependant upon Staff's financial analysis. In the event the amount recommended in Staff's financial analysis is not sufficient to complete the water loss related projects, Staff recommends that the Naco Town System – Service Line Connection and Bisbee Junction System – Replace Main on Bisbee Junction Road projects be given first priority. Any remaining funds should be applied to addressing the most serious water loss issues in the Bisbee Junction System – Distribution Piping project.

Staff further recommends that the Company file for Staff's review and certification within 30 days of the effective date of the order, as a compliance items in this docket, a list of projects that it proposes to undertake using the debt authorization amount ultimately approved in this matter.

Staff further recommends that when preparing the above list the Company shall give priority to projects that are the most effective and cost efficient in addressing its water loss issue.

Need Category: Water Loss Reduction

Company Priority Ranking	Project Description	Company's Estimated Cost (\$)	Staff Recommendation (\$)
1	Naco Town System – Service Line Connections ^{1, 2}	401,792.98	401,792.98
1	Bisbee Junction System – Replace Main on Bisbee Junction Road ²	26,072.10	26,072.10
3	Bisbee Junction System – Distribution Piping	644,744.10	644,744.10
	Sub-total	1,072,609.18	1,072,609.18

Need Category: Develop New Water Sources (related to groundwater remediation due to contamination from sulfate plume)

1	Southern Upper San Pedro River Hydrogeologic Assessment ³	74,960.00	0
2	Bisbee Junction System – Well Site #7 Well installation and Source Approval	55,419.70	0
2	Bisbee Junction System - Well Site #7 Plant Construction	104,057.20	0
2	Water Main Extension To Naco Highway System and Bisbee Junction System	1,008,635.80	0
	Sub-total	1,243,072.70	0

Need Category: Well Site Improvements and Compliance Upgrades

3	Naco Town System - Well Site #2 Renovations & Well Abandonment	36,947.60	10,000.00 ⁴
3	Naco Town System – Well Site #6 Renovation	27,055.50	0
3	Naco Highway System – Well Site #3 Renovations & Well Abandonment	35,389.40	5,000.00 ⁵
3	Bisbee Junction System – Well Site #5 Well Abandonment	9,900.60	0
3	Bisbee Junction System – Well Site #4 Renovations and Well Abandonment	32,144.50	0
	Sub-total	141,437.60	15,000.00

	Total	2,457,119.48	1,087,609.18
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Note: 1. Project continues a WIFA funded project which the Commission approved in a previous financing application (Docket # W-02860A-98-0259). Additional funding is needed so that this project can be completed.

2. In the event the amount recommended in Staff's financial analysis is not sufficient to complete the water loss related projects, Staff further recommends that the Naco Town System – Service Line Connection and Bisbee Junction System – Replace Main on Bisbee Junction Road projects be given first priority.

3. Funding requested for a hydrogeologic data review and evaluation of the regional aquifer which has been impacted by a sulfate plume caused by mining in the area.

4. Assuming sufficient funding is available Staff recommends that only the pressure tank and chlorinator installation be completed at this time. Staff's adjusted amount for this work is \$10,000 which includes \$9,000 for a 2,000 gallon pressure tank and \$1,000 for a 50 gallon chlorinator.

5. Assuming sufficient funding is available Staff recommends that only the pressure tank installation be completed at this time. Staff's adjusted amount for this work is \$5,000.

Staff concludes that the proposed projects and the cost estimates presented in the right-hand column of the tables above as amended by Staff are appropriate and reasonable for purposes of this financing request. However, no "used and useful" determination of the proposed project items were made and no particular treatment should be inferred for rate making or rate base purpose in the future.

M. OTHER ISSUES

I. Service Line and Meter Installation Charges

The Company is proposing to revise its meter and service line installation charges. These charges are refundable advances and the Company's proposed charges are within Staff's

experience of what are reasonable and customary charges. Therefore, Staff recommends approval of meter and service line installation charges proposed by the Company as shown in the table below.

Table 8 Service Line and Meter Installation Charges

Meter Size	Current Charges	Proposed Charges	Staff Recommendation
5/8 x3/4-inch	\$400	\$450	\$450
3/4-inch	\$400	\$475	\$475
1-inch	\$500	\$550	\$550
1-½-inch	\$715	\$775	\$775
2-inch	\$1,305	\$1,375	\$1,375
3-inch	\$1,815	\$1,975	\$1,975
4-inch	\$2,860	\$3,040	\$3,040
6-inch	\$5,275	\$5,635	\$5,635

II. Curtailment Tariff

The Company has had an approved curtailment tariff on file with the Commission since August 6, 2001.

III. Retired Plant

Staff learned during its inspection that several plant items have been dismantled and are no longer in-service. Staff used reconstruction cost new study techniques and trend factors to estimate a retirement value for the subject plant items. Staff recommends a rate base adjustment totaling \$12,991¹ to account for the plant removed from service. Details of the adjustment are discussed below:

1. Old Well #2 which was installed in 1959 and dismantled in 1999 should be removed from rate base. The estimated original cost ("OC") is \$1,565 using the 2005 Handy-Whitman Index to calculate the cost of drilling a well in 1959 to a depth of 210 feet equipped with 8-inch casing.
2. Old Well #3 which was estimated to have been installed in 1950 was dismantled in 2003 should be removed from rate base. The estimated OC is \$746 using the Handy-Whitman Index to calculate the cost of drilling a well in 1950 to a depth of 160 feet equipped with

¹ The sum of \$1,565, \$746, \$7,927, \$1,124, and 1,629 is \$12,991.

8-inch casing.

3. Old Well #4 which was installed in 1926 and dismantled in 1999 should be removed from rate base. The estimated OC is \$7,927 using the Handy-Whitman Index to calculate the cost of drilling a well in 1926 to a depth of 379 feet equipped with 16-inch casing.
4. Old Well #1 which was installed in 1951 and dismantled in 1999 should be removed from rate base. The estimated OC is \$1,124 using the Handy-Whitman Index to calculate the cost of drilling a well in 1951 to a depth of 215 feet equipped with 8-inch casing.
5. Old Well #5 which was installed in 1960 and dismantled in 1999 should be removed from rate base. The estimated OC is \$1,629 using the Handy-Whitman Index to calculate the cost of drilling a well in 1960 to a depth of 175 feet equipped with 10-inch casing.

EXHIBIT 1

Naco' Certificate Service Area

COUNTY: *Cochise*

COUNTY: *Cochise*

RANGE 23 East

RANGE 24 East

1	2	3	4	5	6	7	8	9	10	11	12
1	2	3	4	5	6	7	8	9	10	11	12
1	2	3	4	5	6	7	8	9	10	11	12
1	2	3	4	5	6	7	8	9	10	11	12
<i>Mexico</i>						<i>Mexico</i>					

TOWNSHIP 24 South



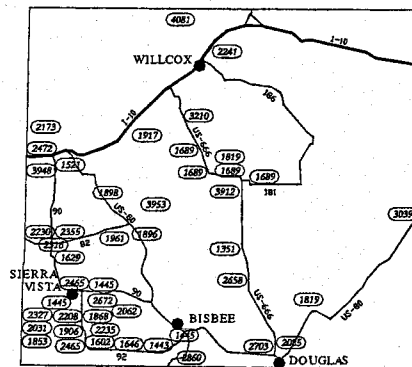
-  W-1445 (3)
Arizona Water Company (Bisbee)
-  W-2860 (1)
Naco Water Company, L.L.C.

EXHIBIT 2

LOCATION OF NACO WATER COMPANY SERVICE AREA

COCHISE COUNTY



2327	ANTELOPE RUN WATER COMPANY	2031	INDIADA WATER COMPANY, INC.
1445	ARIZONA WATER COMPANY	1961	LUCKY HILLS WATER COMPANY
3953	BACHMANN SPRINGS UTILITY COMPANY	2472	MESCAL LAKES WATER SYSTEMS, INC.
2465	BELLA VISTA WATER COMPANY	1646	MIRACLE VALLEY WATER COMPANY, INC.
3039	BROOKE WATER L.L.C.	2703	MONTE VISTA WATER COMPANY, L.L.C.
3210	C-D OASIS WATER COMPANY	2230	MUSTANG WATER COMPANY
1689	CLEAR SPRINGS UTILITY COMPANY	2658	MWC, INC.
2672	CLOUD NINE WATER COMPANY, INC.	2860	NACO WATER COMPANY, L.L.C.
1868	COCHISE WATER COMPANY	1602	NICKSVILLE WATER COMPANY, INC.
1629	CORONADO ESTATES WATER COMPANY	1443	PALOMINAS DEVELOPMENT COMPANY
2085	CORONADO WATER COMPANY	1853	PARKER SPRINGS WATER COMPANY
2316	CRYSTAL WATER COMPANY	2208	PUEBLO DEL SOL WATER COMPANY
1917	DRAGOON WATER COMPANY, INC.	2062	SOUTHLAND UTILITIES COMPANY, INC.
1906	EAST SLOPE WATER COMPANY	1819	SOUTH WESTERN FARM AND CATTLE COMPANY
1351	ELFRIDA DOMESTIC WATER USERS ASSOCIATION	1521	SUE JUAN WATER COMPANY
3948	EMPIRITA WATER COMPANY, LLC	2355	SULGER WATER COMPANY # 2
1898	F & F WATER COMPANY	3912	SUNIZONA WATER COMPANY
2241	HIDDEN VALLEY WATER COMPANY	2173	WILLOW LAKES PROPERTY OWNERS ASSOCIATION
1896	HOLIDAY WATER COMPANY	4081	WINCHESTER WATER COMPANY, LLC
2235	HORSESHOE RANCH WATER COMPANY		

EXHIBIT 3A
SYSTEMATIC DRAWING

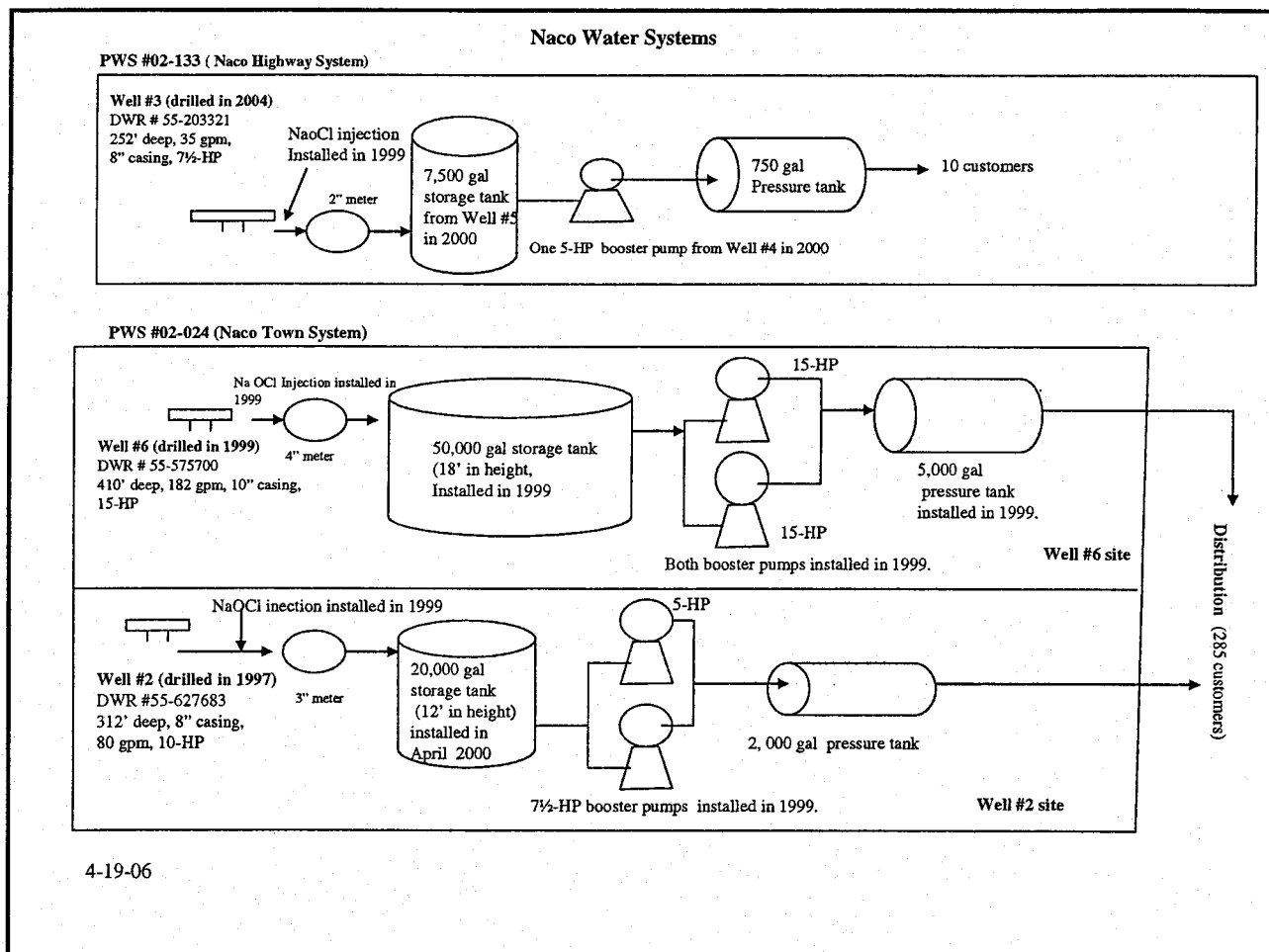


EXHIBIT 3B
SYSTEMATIC DRAWING

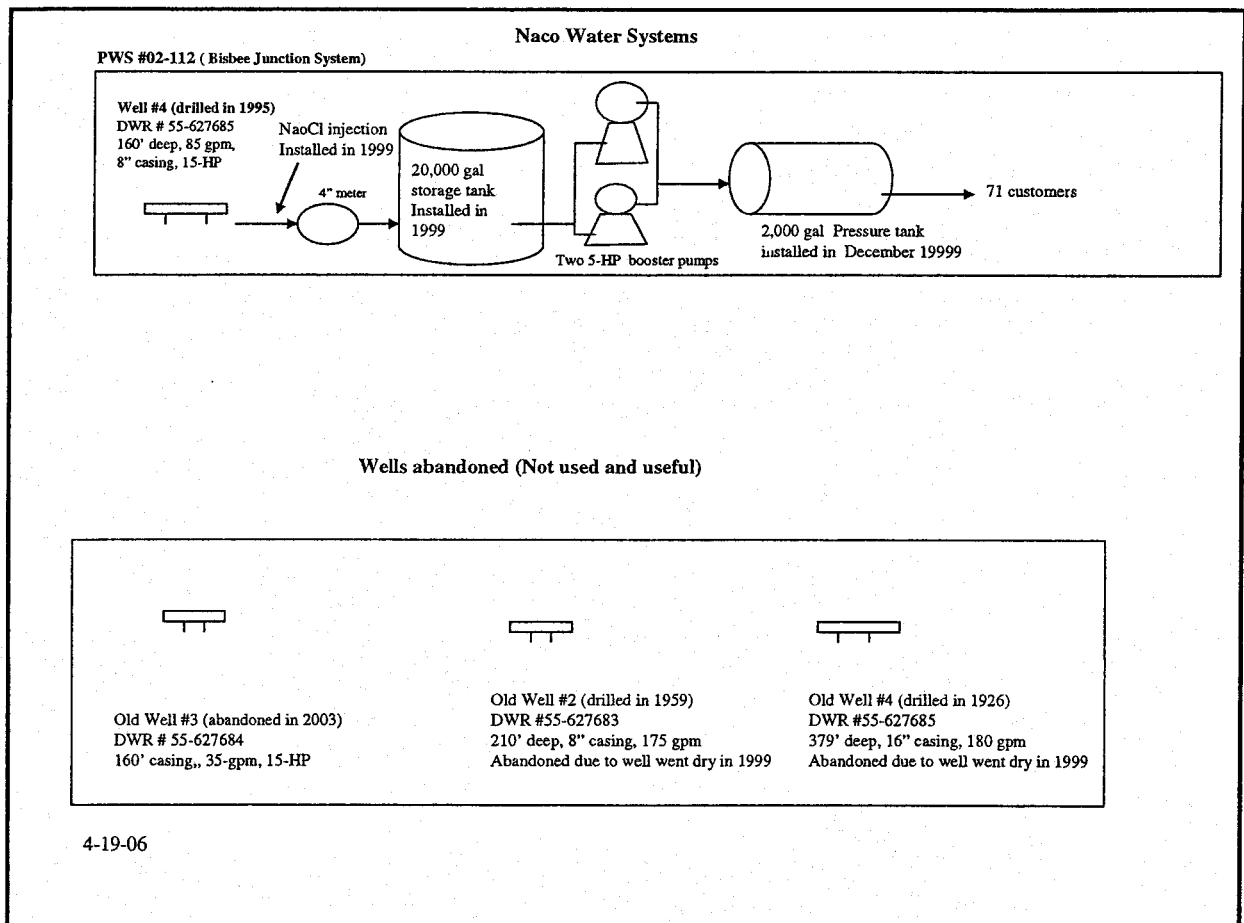


EXHIBIT 3C
SYSTEMATIC DRAWING

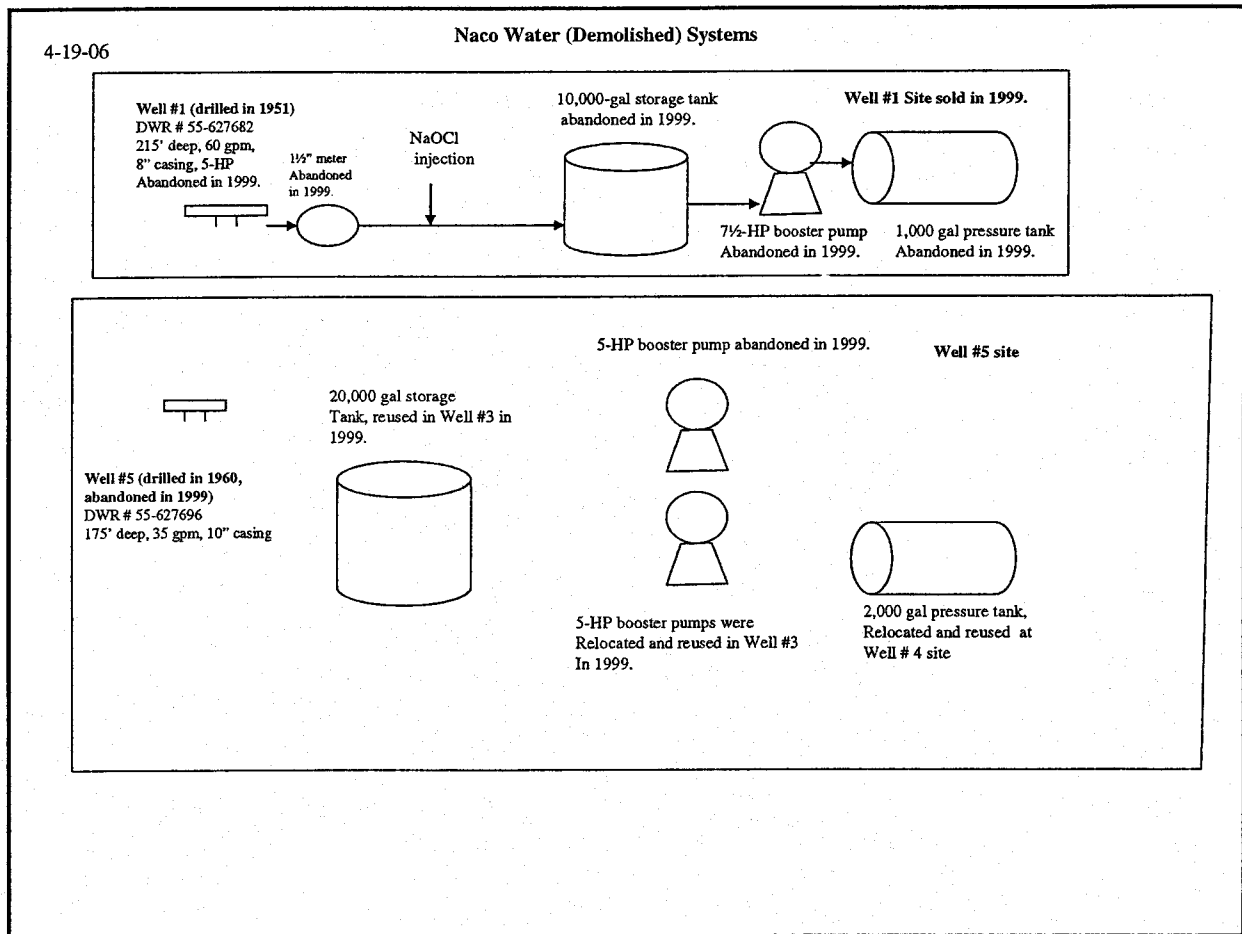


EXHIBIT 4A

WATER USAGE ON THE NACO WATER COMPANY SERVICE AREA

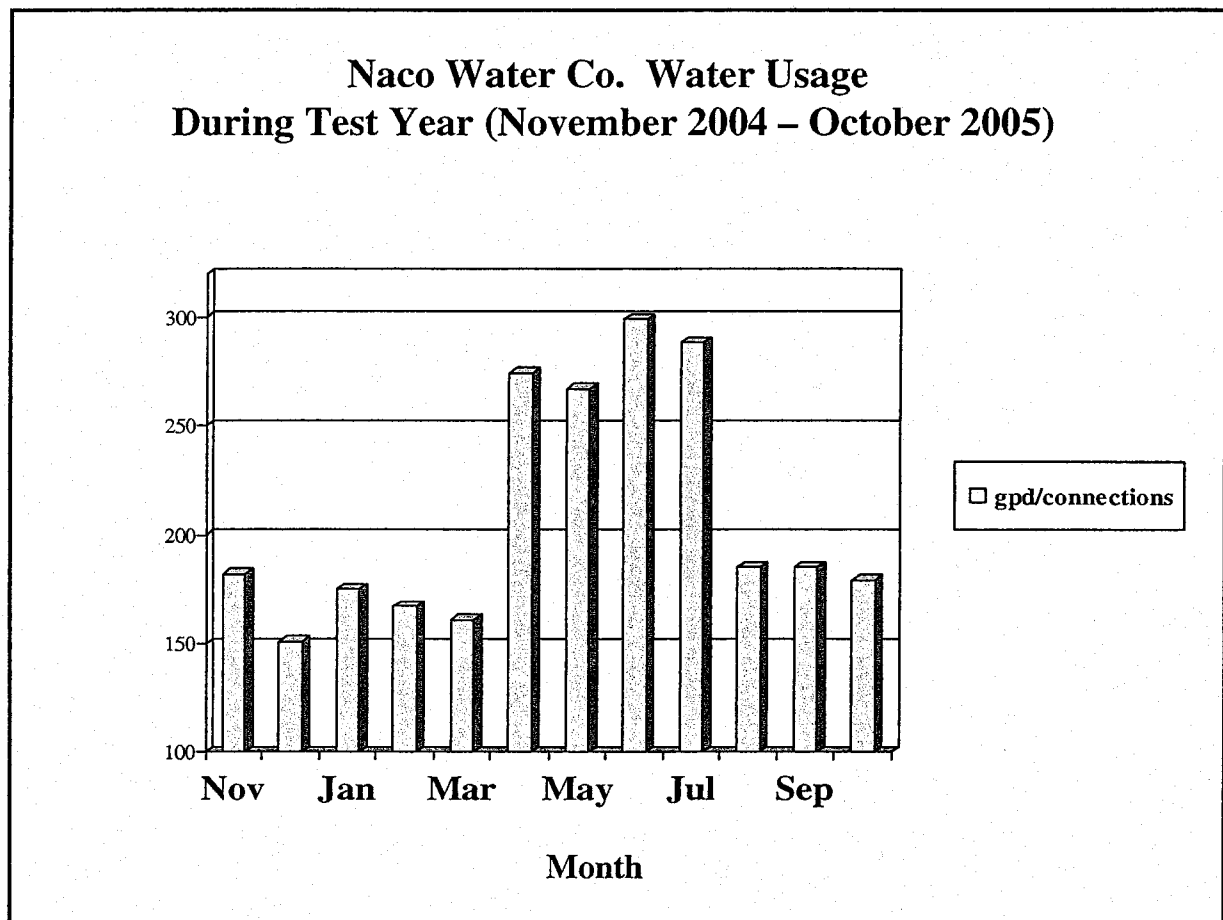


EXHIBIT 4B

WATER USAGE ON THE NACO WATER COMPANY SERVICE AREA

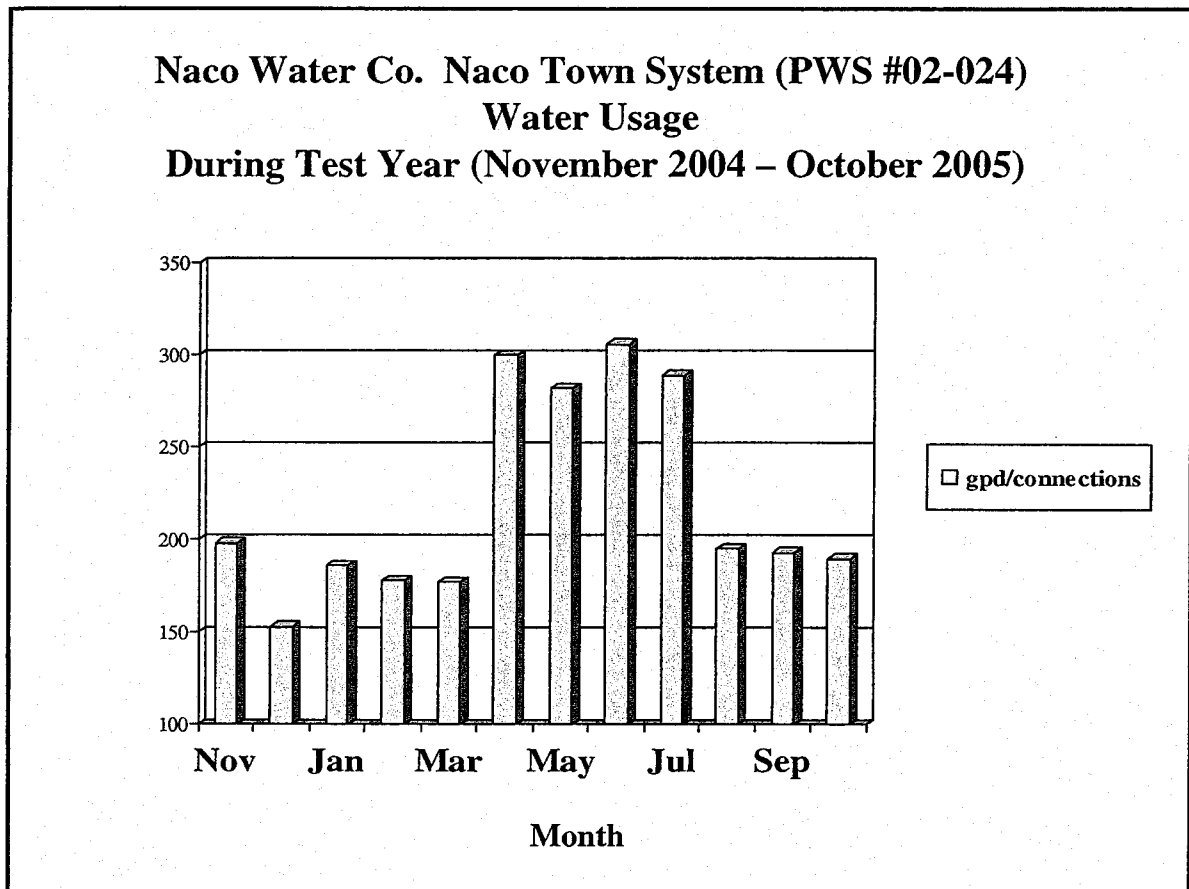


EXHIBIT 4C

WATER USAGE ON THE NACO WATER COMPANY SERVICE AREA

**Naco Water Co. Bisbee Junction System (PWS #02-122) Water Usage
During Test Year (November 2004 – October 2005)**

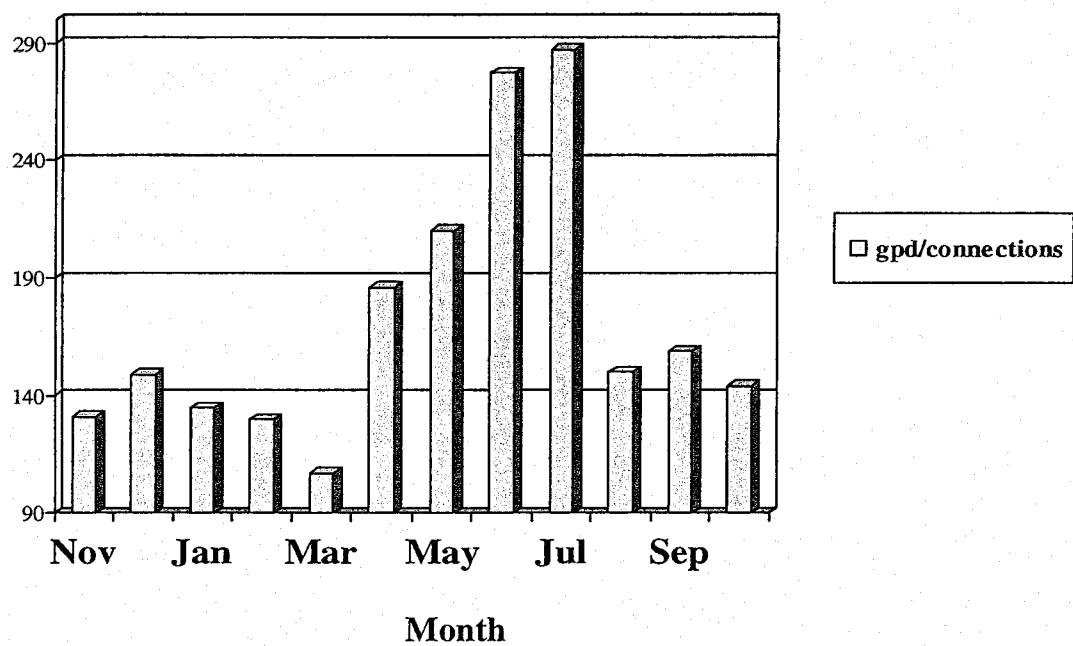


EXHIBIT 4D

WATER USAGE ON THE NACO WATER COMPANY SERVICE AREA

**Naco Water Co. Naco Highway System (PWS #02-133)
Water Usage
During Test Year (November 2004 – October 2005)**

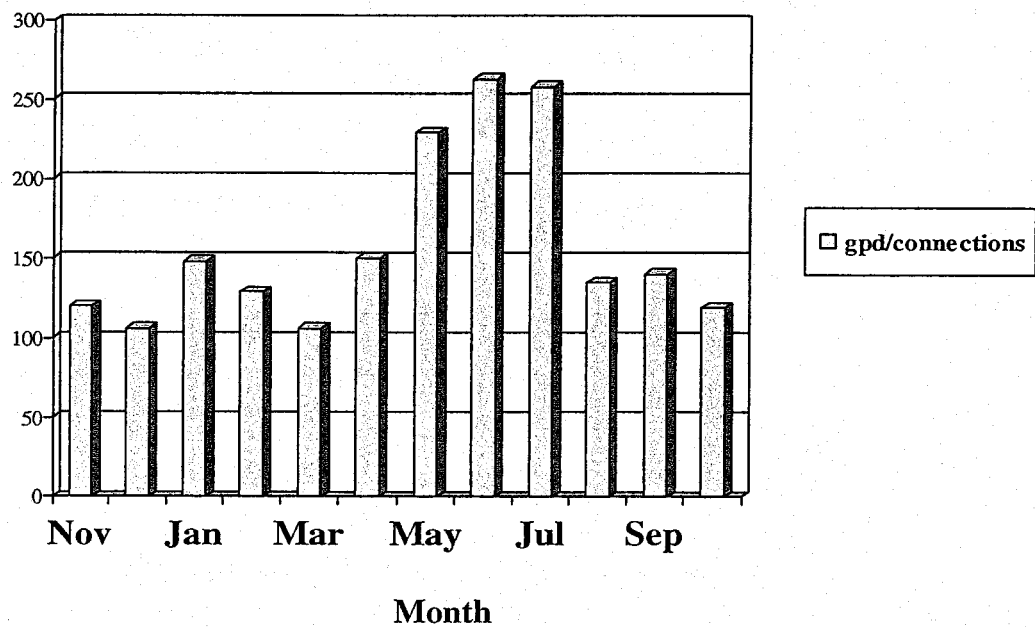


EXHIBIT 5

**ACTUAL AND PROJECTED GROWTH IN NACO WATER COMPANY SERVICE
AREA**

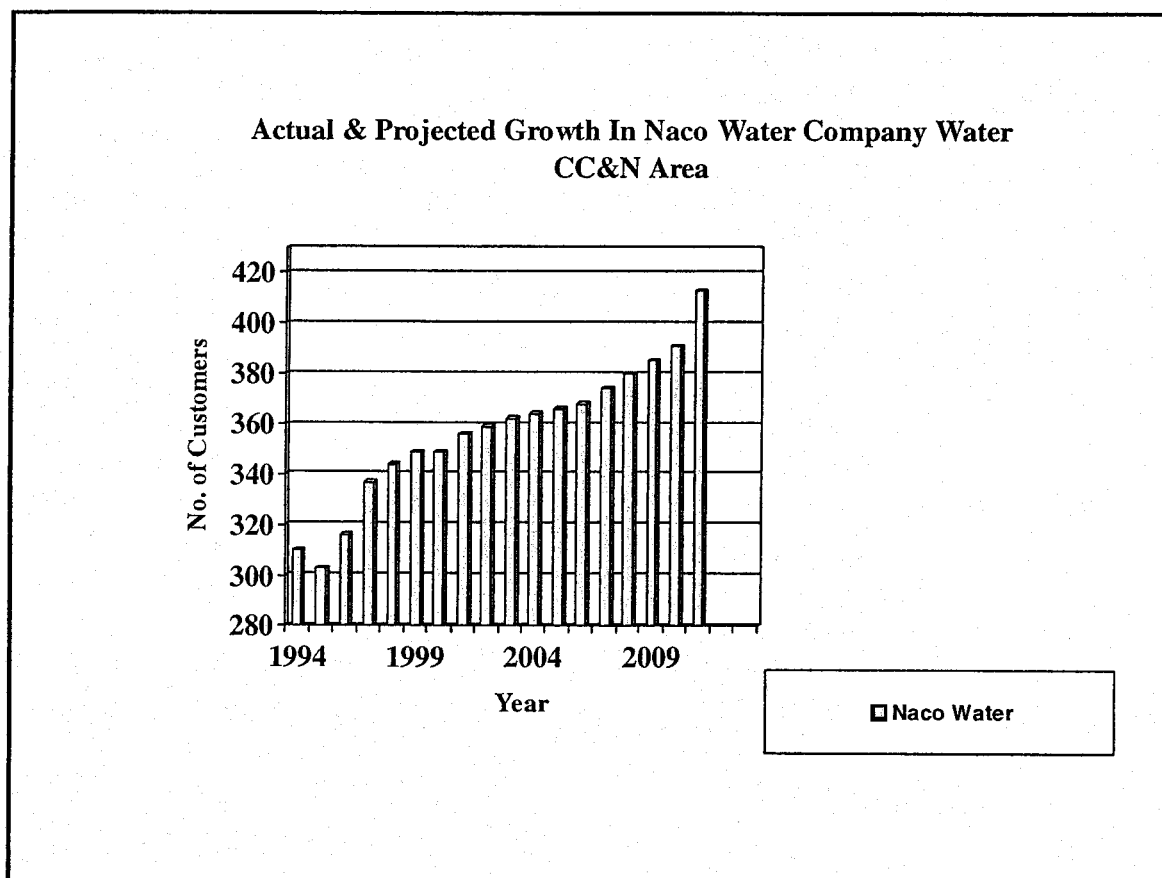


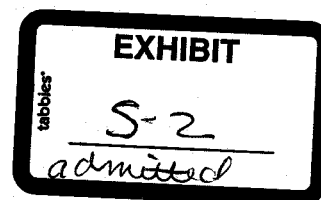
Exhibit 6

Water Depreciation Rates

Acct. No.	Depreciable Plant	Average Service Life (Years)	Annual Accrual Rate (%)
304	Structures & Improvements	30	3.33
305	Collecting & Impounding Reservoirs	40	2.50
306	Lake, River, Canal Intakes	40	2.50
307	Wells & Springs	30	3.33
308	Infiltration Galleries	15	6.67
309	Raw Water Supply Mains	50	2.00
310	Power Generation Equipment	20	5.00
311	Pumping Equipment	8	12.5
320	Water Treatment Equipment		
320.1	Water Treatment Plants	30	3.33
320.2	Solution Chemical Feeders	5	20.0
330	Distribution Reservoirs & Standpipes		
330.1	Storage Tanks	45	2.22
330.2	Pressure Tanks	20	5.00
331	Transmission & Distribution Mains	50	2.00
333	Services	30	3.33
334	Meters	12	8.33
335	Hydrants	50	2.00
336	Backflow Prevention Devices	15	6.67
339	Other Plant & Misc Equipment	15	6.67
340	Office Furniture & Equipment	15	6.67
340.1	Computers & Software	5	20.00
341	Transportation Equipment	5	20.00
342	Stores Equipment	25	4.00
343	Tools, Shop & Garage Equipment	20	5.00
344	Laboratory Equipment	10	10.00
345	Power Operated Equipment	20	5.00
346	Communication Equipment	10	10.00
347	Miscellaneous Equipment	10	10.00
348	Other Tangible Plant	----	----

BEFORE THE ARIZONA CORPORATION COMMISSION

JEFF HATCH-MILLER
Chairman
WILLIAM A. MUNDELL
Commissioner
MIKE GLEASON
Commissioner
KRISTIN K. MAYES
Commissioner
BARRY WONG
Commissioner



IN THE MATTER OF THE APPLICATION OF)
NACO WATER COMPANY, L.L.C.,)
AN ARIZONA LIMITED LIABILITY)
COMPANY, FOR PERMANENT)
INCREASES IN ITS WATER RATES AND)
CHARGES FOR UTILITY SERVICE WITHIN)
COCHISE COUNTY, ARIZONA)

DOCKET NO. W-02860A-06-0002

IN THE MATTER OF THE APPLICATION OF)
NACO WATER COMPANY, L.L.C.,)
AN ARIZONA LIMITED LIABILITY)
COMPANY, FOR APPROVAL OF)
FINANCING)

DOCKET NO. W-02860A-05-0727

DIRECT

TESTIMONY

OF

JEFFREY M. MICHLIK

PUBLIC UTILITIES ANALYST IV

UTILITIES DIVISION

ARIZONA CORPORATION COMMISSION

SEPTEMBER 1, 2006

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BEFORE THE ARIZONA CORPORATION COMMISSION

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ARIZONA CORPORATION COMMISSION

SEPTEMBER 1, 2006

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EXECUTIVE SUMMARY
NACO WATER COMPANY, LLC
DOCKET NOS. W-02860A-06-0002 AND W-02860A-05-0727

Naco Water Company, LLC ("Company") is an Arizona limited liability company. The water utility is located in Cochise County. The Company's water systems are located in two areas. One area consists of the Town of Naco, and contains the Naco Town site system. The other area is located approximately three (3) miles east of Naco. This area consists of two systems: the Bisbee Junction and Bisbee Highway system. The systems are not interconnected. The Company served approximately 366 customers during the test year ended December 31, 2005. The Company's current rates were approved in Decision No. 60500, dated November 25, 1997, and the Company's emergency rates were approved in Decision No. 67984, dated May 10, 2005.

Rate Application:

The Company proposes rates that would increase operating revenue by \$213,899 to produce operating revenue of \$389,572 resulting in operating income of \$201,142, or a 121.76 percent increase over test year revenue of \$175,673. The Company also proposes a fair value rate base ("FVRB") of \$658,312 which is its original cost rate base, and a 30.55 percent rate of return on the FVRB.

Staff recommends rates that would increase operating revenue by \$116,431 to produce operating revenue of \$275,860 resulting in operating income of \$95,691, or a 73.03 percent increase over adjusted test year revenue of \$159,429. Staff recommends a FVRB of \$637,938, and a 15 percent rate of return on the FVRB.

Finance Application:

The Company is requesting authorization to incur \$2.5 million in debt from the Water Infrastructure Finance Authority ("WIFA") over a 20-year period at an estimated 5.6 percent interest rate. The debt will be used to fund construction projects needed to address the Company's water safety, quality, and system reliability. Using Staff's recommended increase in operating revenues of \$116,431, would produce a times interest earned ratio ("TIER") of 0.62 and a debt service coverage ("DSC") ratio of 0.51.

Staff recommends authorization of a \$450,000 loan from WIFA over a 20-year period at an estimated 5.6 percent interest rate. Using Staff's recommended increase in operating revenues of \$116,431, would produce a TIER of 2.32 and a DSC ratio of 1.53.

Staff's revenue requirement was determined by the need for a sufficient debt service coverage ratio, while attempting to ameliorate rate shock.

Rate Design:

Staff recommends an inverted three-tier commodity rate structure for its 5/8-inch meters and an inverted two-tier rate structure for larger meters. The recommended rate structure conforms with those regularly adopted by the Commission in recent years. The typical 5/8-inch meter residential bill with median use of 5,272 gallons would increase by \$21.89, or 69.83 percent, from \$31.35 to \$53.24. However, the increase is substantially less if we take into account the effect of the emergency rate increase and interim rate increase. For instance, after these factors are considered the typical 5/8-inch meter residential bill with median use of 5,272 gallons would increase by \$14.23, or 36.48 percent from \$39.01 to \$53.24.

INTRODUCTION

Q. Please state your name, occupation, and business address.

A. My name is Jeffrey M. Michlik. I am a Public Utilities Analyst IV employed by the Arizona Corporation Commission ("ACC" or "Commission") in the Utilities Division ("Staff"). My business address is 1200 West Washington Street, Phoenix, Arizona 85007.

Q. Briefly describe your responsibilities as a Public Utilities Analyst IV.

A. In my capacity as a Public Utilities Analyst IV, I analyze and examine accounting, financial, statistical and other information and prepare reports based on my analyses that present Staff's recommendations to the Commission on utility revenue requirements, rate design and other matters.

Q. Please describe your educational background and professional experience.

A. In 2000, I graduated from Idaho State University, receiving a Bachelor of Business Administration Degree in Accounting and Finance, and I am a Certified Public Accountant with the Arizona State Board of Accountancy. I have attended the National Association of Regulatory Utility Commissioners' ("NARUC") Utility Rate School, which presents general regulatory and business issues.

I joined the Commission as a public utilities analyst in May of 2006. Prior to employment with the Commission, I worked four years for the Arizona Office of the Auditor General as a Staff Auditor, and one year in public accounting as a Senior Auditor.

Q. What is the scope of your testimony in this case?

A. I am presenting Staff's analysis and recommendations regarding Naco Water Company, LLC's ("Company") application for a permanent increase in its rates and charges for utility service within Cochise County, Arizona. I am presenting testimony and schedules

1 addressing rate base, operating revenues and expenses, revenue requirement, financing,
2 and rate design. Ms. Dorothy Hains is presenting Staff's engineering analysis and related
3 recommendations.

4
5 **Q. What is the basis of your testimony in this case?**

6 A. I performed a regulatory audit of the Company's application and records. The regulatory
7 audit consisted of examining and testing financial information, accounting records, and
8 other supporting documentation and verifying that the accounting principles applied were
9 in accordance with the Commission adopted NARUC Uniform System of Accounts
10 ("USOA").

11
12 **BACKGROUND**

13 **Q. Please explain why the Company did not file the necessary forms for a class C utility**
14 **and why Staff accepted the class D application.**

15 A. The Company meets the definition of a class C water company as it is proposing to
16 increase operating revenues to \$389,572. The range for a class C water company is based
17 on operating revenues that are between \$250,000 and \$999,999. The previous rate case
18 which was decided in Decision No. 60500 dated November 25, 1997, was filed as a class
19 D case. Staff accepted the class D application in this case to facilitate the Company's
20 obligation to file a permanent rate increase application as a follow-up to its emergency
21 rate increase. It was decided that the Company would be treated as a class C utility even
22 though a class D application was submitted.

23
24 **Q. Please review the background of this application.**

25 A. Naco is a limited liability company. The water utility is located in Cochise County. The
26 Company's water systems are located in two areas. One area consists of the Town of
27 Naco, and contains the Naco Town site system. The other area is located approximately

1 three (3) miles east of Naco. This area consists of two systems: the Bisbee Junction and
2 Bisbee Highway system. The systems are not interconnected. The Company served
3 approximately 366 customers during the test year ended December 31, 2005. The
4 Company's current rates were approved in Decision No. 60500, dated November 25,
5 1997, and the Company's emergency rates were approved in Decision No. 67984, dated
6 May 10, 2005.

7
8 On January 3, 2006, the Company filed an application requesting a permanent rate
9 increase. On March 2, 2006, Staff filed a letter declaring the application sufficient.

10
11 **CONSUMER SERVICES**

12 **Q. Please provide a brief history of customer complaints received by the Commission**
13 **regarding the Company. Additionally, please discuss customer responses to the**
14 **Company's proposed rate increase.**

15 **A.** Staff reviewed the Commission's records and found six complaints during the past three
16 and a half years. The nature of the complaints involved water outages, low-pressure,
17 billing problems and meter placement. Three opinions were filed opposing the rate
18 increase.

19
20 **SUMMARY OF FILING, RECOMMENDATIONS, AND ADJUSTMENTS**

21 **Q. Please summarize the Company's filing.**

22 **A.** The Company proposes increasing total annual operating revenues to \$389,572, a
23 \$213,899, or a 121.76 percent increase, over test year revenues of \$175,673. This will
24 produce operating income of \$201,142. The Company proposes operating expenses of
25 \$188,430, an original cost rate base "OCRB" of \$658,312, and a 30.55 percent rate of
26 return on OCRB. The OCRB is the same as the fair value rate base ("FVRB") in this case.

1 **Q. Please summarize Staff's recommendations.**

2 A. Staff recommends increasing total annual operating revenue to \$275,860, an \$116,431, or
3 a 73.03 percent increase, over adjusted test year revenues of \$159,429. This will produce
4 operating income of \$95,691. Staff recommends operating expenses of \$180,170, a
5 FVRB of \$637,938, and a 15 percent rate of return on OCRB.

6
7 **Q. Please summarize the rate base adjustments addressed in your testimony.**

8 A. My testimony addresses the following issues:

9
10 Cash Working Capital - This adjustment decreases rate base by \$18,496.

11
12 Removal of Plant in Service Surcharge – This adjustment decreases plant in service by
13 the amount by which the management company charged a 15 percent surcharge on
14 invoices if the Company did not have an open account with the vendor, \$1,878.

15
16 Removal of Plant in Service and Accumulated Depreciation – This adjustment decreases
17 plant in service by \$12,991 due to well abandonment and also decreases the corresponding
18 accumulated depreciation by \$12,991.

19
20 **Q. Please summarize the operating income adjustments addressed in your testimony.**

21 A. My testimony addresses the following issues:

22
23 Removal of all Revenue Surcharges – This adjustment decreases metered revenues by
24 \$16,244 to eliminate all interim surcharges.

25
26 Reclassification of Outside Services to Rate Case Expense – This adjustment decreases
27 expense by \$1,870, and reclassifies this amount as rate case expense.

1 Water Testing Expense – This adjustment increases expense by \$6,230 to reflect Staff's
2 estimate of water testing costs.

3
4 Rate Case Expense – This adjustment decreases expense by \$2,196 to reflect the
5 amortization of the rate case expense over a three-year period.

6
7 Depreciation Expense – This adjustment increases expense by \$1,255 to reflect the
8 application of Staff's recommended depreciation rates on a going-forward basis, to Staff
9 adjusted plant by account number.

10
11 Property Tax Expense – This adjustment increases expense by \$2,293 to reflect the
12 application of Staff's recalculation of property tax expense, based on Staff's
13 recommended revenue requirement.

14
15 Reclassification of Miscellaneous Expense to Interest Expense – This adjustment
16 decreases miscellaneous expense by \$13,973 and increases interest expense by \$13,973
17 due to Staff's reclassification.

18
19 **RATE BASE**

20 **Q. Please review the Company's proposed rate base.**

21 A. The Company is proposing a FVRB of \$658,312 as shown on Schedule JMM-1.

22
23 **Q. Is Staff recommending any changes to the Company's proposed rate base?**

24 A. Yes. Staff recommends a FVRB of \$637,938 as shown on Schedule JMM-1, a reduction
25 of \$20,374 from the Company's proposed FVRB.

26

1 **Q. How many rate base adjustments is Staff recommending?**

2 A. Staff recommends three adjustments to rate base as shown on Schedules JMM-2 and
3 JMM-3. Each adjustment described below is made to the FVRB.

4

5 **Rate Base Adjustment No. 1 – Cash Capital**

6 **Q. What is the Company proposing for the Allowance of Cash Working Capital?**

7 A. The Company is proposing an \$18,496 allowance for cash working capital based on a
8 simple income statement approach which takes 1/8 of the amount presented on the income
9 statement for operations and maintenance expense and 1/24 of the amount for power. This
10 methodology is known as the formula method.

11

12 **Q. What recommendation is Staff making?**

13 A. Staff is recommending that the \$18,496 allowance for cash working capital be disallowed,
14 as a utility of this size should have presented a lead-lag study to establish an estimate of
15 cash working capital.

16

17 **Q. Why is Staff recommending disallowance of this amount?**

18 A Staff typically only allows cash working capital allowances calculated by the formula
19 method for small class D and E utilities. The formula method always produces a positive
20 cash working capital need. Utilities classified as A, B, or C are much larger and Staff
21 believes that the formula method does not accurately reflect the related cash working
22 capital needs. Typically Staff finds that proper lead/lag studies usually produce a negative
23 cash working capital need. Staff recommends disallowance of any cash working capital
24 allowance, as depicted on schedule JMM-4.

Rate Base Adjustment No. 2 – Removal of Plant in Service Surcharge

Q. Why is Staff removing this surcharge?

A. Staff is removing \$1,878 of surcharges related to plant in service. In response to Staff data request JMM 5-1, which asked the question of why there was a 15 percent surcharge added to some of the invoices and how the 15 percent was derived. The Company responded by stating "15 percent surcharge amounts are added to the company invoices only if the Company itself does not have an open account with the vendor themselves; if Southwestern Utility Management which is the Company's Management, has to have items billed to its account and is carried as an accounts payable on its books then Southwestern Utility Management adds a 15 percent surcharge to the invoice." Staff believes this amount is unauthorized and inappropriate and should not be capitalized in plant additions, which then overstates plant in service. This adjustment is reflected on schedule JMM-5.

Rate Base Adjustment No. 3 – Removal of Plant in Service and Accumulated Depreciation.

Q. Please explain Staff's rate base adjustment No. 3.

A. Staff decreased plant in service by \$12,991 due to abandonment of wells, and is discussed in Staff's Engineering Report. Likewise a \$12,991 adjustment must also be made to accumulated depreciation. More detail of the calculation is shown on Schedule JMM-6.

OPERATING INCOME

Operating Income Summary

Q. What are the results of Staff's analysis of test year revenues, expenses, and operating income?

A. Staff's analysis resulted in adjusted test year revenues of \$159,429, operating expenses of \$180,170 and operating loss of \$20,741 as shown on Schedules JMM-7 and JMM-8. Staff made seven adjustments to operating income.

Operating Income Adjustment No. 1 – Removal of all Revenue Surcharges

Q. Please explain Staff's operating income adjustment no. 1.

A. Staff's adjustment reduces metered revenue by \$16,244, from \$173,620 to \$157,376 as shown on Schedule JMM-9. This adjustment was necessary to first remove the surcharge of \$1.16 which came into effect when additional funding of \$51,619 was approved in Decision No. 61070. This surcharge was to stay in effect until the next rate case application. As the Company has filed for new financing and new rates this \$1.16 surcharge should be eliminated. In addition, emergency rate surcharges were approved in Decision No. 67984. Further, the Order stated that the Company apply for a permanent rate increase as soon as possible. Likewise these surcharges should also be eliminated when new, permanent rates are ordered in this filing.

Operating Income Adjustment No. 2 – Reclassification of Outside Services to Rate Case Expense

Q. Please explain Staff's operating income adjustment no. 2.

A. Staff's adjustment reduces outside services by \$1,870, from \$56,429 to \$54,559 as shown on Schedule JMM-10. This adjustment was made because some outside services are more appropriately classified as rate case expense. See operating income adjustment no. 5, Schedule JMM-12 for the corresponding inclusion of this amount.

Operating Income Adjustment No. 3 – Water Testing Expense

Q. Please explain Staff's operating income adjustment no. 3.

A. Staff's adjustment increased water testing by \$6,230, from \$3,600 to \$9,830, as shown on Schedule JMM-11. An explanation of this adjustment can be obtained from the Staff Engineering Report.

Operating Income Adjustment No. 4 – Rate Case Expense

Q. Please explain Staff's operating income adjustment no. 4.

A. Staff's adjustment decreases rate case expense by \$2,196, from \$5,319 to \$3,123.

Q. Why does this amount differ from what the Company proposed?

A. Staff first had to make two adjustments to the test year expense amount. One was to reclassify outside services to rate case expense, and the second was to add amounts spent and estimated after the test year. Second, Staff amortized the rate case expense over three years. Staff's calculation is shown on Schedule JMM-12.

Operating Income Adjustment No. 5 – Depreciation Expense

Q. Please explain Staff's operating income adjustment no. 5.

A. Staff's adjustment increased depreciation expense by \$1,255, from \$33,368 to \$34,623, as reflected on Schedule JMM-13.

Q. Why does Staff recommend a new depreciation rate for each utility plant account going forward?

A. In recent Decisions, the Commission has been moving away from the use of composite rates in favor of individual depreciation rates for each water utility plant account. Staff has developed typical and customary depreciation rates within a range of anticipated equipment life. For instance, using a composite rate of 5 percent would not be appropriate for all plant assets, e.g. transmission and distribution lines may have an average service life of 50 years while transportation equipment may only have an average service life of 5 years. Thus, Staff recommends individual depreciation rates be used going-forward for each water utility plant account.

Operating Income Adjustment No. 6 – Property Tax Expense

Q. Please explain Staff's operating income adjustment no. 6.

A. Staff's adjustment increases property tax \$2,293, from \$10,323 to \$12,616. Staff's calculation is based upon Staff's adjusted test year and recommended revenues. Please see Schedule JMM-14 for Staff's calculation.

Operating Income Adjustment No. 7 – Reclassification of Miscellaneous Expense to Interest Expense

Q. Please explain Staff's operating income adjustment no. 7.

A. Staff's adjustment decreases miscellaneous expense \$13,973, from \$13,973 to \$0, and increases interest expense \$13,973, from \$3,516 to \$17,489. Per examination of the Water Infrastructure Finance Authority ("WIFA") loan agreement, Staff determined that this amount was misclassified as miscellaneous expense and should be reclassified as interest expense per the WIFA loan agreement. This adjustment is reflected on Schedule JMM-15.

REVENUE REQUIREMENT

Q. What does the Company propose for an increase in operating revenue?

A. The Company proposes increasing operating revenue by \$213,899 from \$175,673 to \$389,572.

Q. What does Staff recommend for an increase in operating revenue?

A. Staff recommends increasing operating revenue by \$116,431 from \$159,429 to \$275,860.

1 **Q. How did Staff determine its recommended operating revenue?**

2 A. Staff determined its recommended revenue requirement by the need for a sufficient debt
3 service coverage ("DSC") ratio, while attempting to ameliorate rate shock. See Schedule
4 JMM-16.

5
6 **FINANCING APPLICATION**

7 **Q. Please provide a brief background for the financing application.**

8 A. The Company filed a financing application (Docket No. W-02860A-05-0727) on October
9 19, 2005, requesting authorization to incur \$700,000 of long-term debt. In an amendment
10 to its application, the Company increased the amount of the loan from \$700,000 to
11 approximately \$2.5 million. Staff requested consolidation of the financing application and
12 the current rate application as the Company would not have sufficient revenue to pay the
13 debt service on the requested loan without increased rates.

14
15 **Q. What is the purpose of the \$2.5 million loan?**

16 A. According to the Company's witness, Bonnie O'Connor, the debt will be used to fund
17 construction projects needed to address the Company's water loss, water quality, and
18 system reliability. A more detailed analysis of Staff Engineering's findings is discussed in
19 the testimony of Staff witness, Ms. Dorothy Hains.

20
21 **Q. What are the proposed terms of the loan?**

22 A. The proposed \$2.5 million loan from WIFA is a 20-year amortizing loan at an estimated
23 5.6 percent interest rate.¹

24
25 **Q. Does Staff recommend a different loan amount than that proposed by the Company?**

26 A. Yes, Staff recommends \$450,000.

¹ The actual interest will be determined at the time the WIFA loan documents are signed.

1 **Q. What is the primary basis of Staff's recommendation?**

2 A. Staff reviewed the construction plans and agreed with the Company that the water loss
3 reduction projects should be given first priority (see Engineering Report).
4

5 **Q. What other factors did Staff consider in determining its recommended loan amount?**

6 A. The Company is in discussions with Phelps Dodge Corporation ("Phelps Dodge"). These
7 discussions may lead to Phelps Dodge providing financial assistance to the Company,
8 which, in turn, would lower the amount of money the Company would need to borrow
9 from WIFA. Additionally, the Staff recommended loan amount mitigates the amount of
10 rate increase customers will experience because the amount of revenue needed to pay the
11 principal and interest payments on the \$450,000 loan is much lower than the amount
12 needed for the \$2.5 million loan.
13

14 **TIER and DSC Analysis**

15 **Q. What DSC ratio and times interest earned ratio ("TIER") does WIFA require for the**
16 **Company?**

17 A. The WIFA DSC ratio requirement is 1.2. This requirement is contained in the mortgage
18 agreement between WIFA and the Company. There is no stated TIER requirement.
19

20 **Q. What was the amount of the Company's outstanding long-term debt at the end of the**
21 **test year, and what was the test year interest expense incurred?**

22 A. At the end of the 2005 test year, the Company had \$450,613² in long-term debt, and it
23 incurred \$16,360 in interest expense as shown on Schedule JMM-16.

² The \$450,613 is presented as \$419,296 in long-term debt and \$31,317 in current maturities, i.e., short-term debt (\$419,296 + \$31,317 = \$450,613).

1 **Q. Would you briefly define the DSC ratio and the TIER?**

2 A. DSC measures an entity's ability to generate cash flow to pay its debt service obligations
3 (interest and principal) from operating activities. It is calculated by dividing (1) earnings
4 before interest, income taxes, and depreciation expense by (2) the principal and interest
5 payments. When DSC is greater than 1.0, operating cash flow is sufficient to cover debt
6 obligations.

7
8 TIER measures the number of times operating income will cover interest on long-term
9 debt. It is calculated by dividing operating income plus income taxes by interest on long-
10 term debt. When TIER is greater than 1.0, operating income is sufficient to cover interest
11 expense.

12
13 **Q. What was the Company's test year TIER and DSC ratios?**

14 A. The Company's test year DSC ratio was 0.29 and its TIER was below zero, and, therefore
15 not meaningful as shown on Column A, lines 8 and 9 of Schedule JMM-16.

16
17 **Q. What are the TIER and DSC ratios under Staff's recommended operating income?**

18 A. Staff's recommended operating income of \$116,431 provides a 2.32 TIER and a 1.53 DSC
19 as shown on Column C of Schedule JMM-16. Staff's proposed operating income would
20 generate enough cash flow to service the Staff recommended level of debt, comply with
21 WIFA debt service coverage requirements and allow for reasonable contingencies.

22
23 **Q. If WIFA were able to authorize a zero percent interest loan, would this change**
24 **Staff's recommendation regarding the loan amount?**

25 A. Yes, Staff would recommend increasing the WIFA loan amount by \$300,000 from
26 \$450,000 to \$750,000 as shown on Schedule JMM-17. This would not change the

1 revenue requirement and would keep the DSC ratio at 1.53, and thus enable the Company
2 to work on more water loss reduction projects.

3
4 **RATE DESIGN**

5 **Q. Have you prepared a schedule summarizing the present, Company proposed, and**
6 **Staff recommended rates and service charges?**

7 A. Yes. A summary of the present, Company proposed, and Staff recommended rates and
8 service charges are provided on Schedule JMM-18.

9
10 **Q. Would you please summarize the present rate design?**

11 A. The present monthly minimum charges by meter size are as follows: 5/8-inch \$16.43; 3/4-
12 inch \$16.43; 1-inch \$31.80; 1 1/2-inch \$41.43; 2-inch \$48.30; 3-inch \$160.00; 4-inch
13 \$260.00; 6-inch \$510.00. The present commodity rate is \$2.83 per thousand gallons from
14 1 gallon up to 10,000 gallons, and \$4.18 for any usage over 10,000 gallons. These rates
15 apply to residential and commercial customers.

16
17 **Q. Would you please summarize the Company's proposed rate design?**

18 A. The Company's proposed monthly minimum charges by meter size are as follows: 5/8-
19 inch \$56.00; 3/4-inch \$56.00; 1-inch \$63.00; 1 1/2-inch \$69.00; 2-inch \$74.00; 3-inch
20 \$180.00; 4-inch \$285.00; 6-inch \$640.00. Zero gallons are included in the monthly
21 minimum charge. The Company proposes a three tier commodity rate with break-over
22 points that increase by meter size. The proposed commodity rate is \$4.80 for the first
23 3000 gallons, \$5.80 for usage over 3,000 but less than 10,000 gallons, and \$6.75 for any
24 usage over 10,000 gallons. These rates apply to residential and commercial customers.

1 **Q. Would you please summarize Staff's recommended rate design?**

2 A. Staff's recommended monthly minimum charges by meter size are as follows: 5/8-inch
3 \$28.00; 3/4-inch \$28.00; 1-inch \$54.00; 1 ½-inch \$71.00; 2-inch \$83.00; 3-inch \$180.00;
4 4-inch \$285.00; 6-inch \$600.00. Zero gallons are included in the monthly minimum
5 charge. Staff recommends an inverted tier rate design that consists of three tiers for the
6 residential 5/8-inch and 3/4-inch meter customers and two tiers for all others. The
7 additional tier for the residential 5/8-inch and 3/4-inch meters is for the first 3,000 gallons.
8 Staff's rate design recognizes the growing importance of managing water as a finite
9 resource and its increasing cost. Efficiency in water use is encouraged by producing a
10 higher customer bill with increased consumption or use of a larger meter. A comparison
11 of the current rates, the Company's proposed rates, and Staff's recommended rates are
12 presented on Schedule JMM-18.

13
14 **Q. What is the rate impact on a 5/8-inch meter residential customer using a median**
15 **consumption of 5,272 gallons?**

16 A. A typical bill analysis is provided on Schedule JMM-18. The median usage of residential
17 5/8-inch meter customers is 5,272 gallons per month. The 5/8-inch meter residential
18 customer would experience a \$52.23 or 166.60 percent increase in their monthly bill from
19 \$31.35 to \$83.58 under the Company's proposed rates and a \$21.89 or 69.83 percent
20 increase in their monthly bill from \$31.35 to \$53.24 under Staff's recommended rates.
21 However, the increase is substantially less if we take into account the effect of the
22 emergency rate increase and interim rate increase. For instance, after these factors are
23 considered the typical 5/8-inch meter residential bill with median use of 5,272 gallons
24 would increase by \$14.23, or 36.48 percent from \$39.01 to \$53.24. A typical bill analysis
25 is provided on Schedule JMM-19.

1 **Q. What is the basis for Staff's recommendation for the respective commodity break-**
2 **over points?**

3 A. The use of the recommended break-over points by Staff serves two purposes. First, it
4 supports the state-wide effort to improve water-use efficiency. Customers are rewarded
5 monetarily by restricting their use to these levels which reflects efficient water use.
6 Second, a desirable characteristic of Staff's rate design is that it effectively serves to
7 provide affordable water to customers willing to limit consumption to their basic needs.

8
9 **Q. What water system service line, meter installation charges, and service charges does**
10 **Staff recommend?**

11 A. As discussed in Staff's Engineering Report, Staff concurs with the Company's proposed
12 increase in system service lines and meter installation charges, as these charges are within
13 Staff's experience of what are reasonable and customary charges. For service charges
14 Staff recommends charges that are consistent with other water company's tariffs. A
15 comparison of the current charges, the Company's proposed charges, and Staff's
16 recommended charges are presented on Schedules JMM-18.

17
18 **Q. Does this conclude your direct testimony?**

19 A. Yes, it does.

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Schedule JMM-1

REVENUE REQUIREMENT

LINE NO.	DESCRIPTION	(A) COMPANY ORIGINAL COST	(B) STAFF ORIGINAL COST
1	Adjusted Rate Base	\$ 658,312	\$ 637,938
2	Adjusted Operating Income (Loss)	\$ (12,757)	\$ (20,741)
3	Current Rate of Return (L2 / L1)	-1.94%	-3.25%
4	Required Rate of Return	30.55%	15.00%
5	Required Operating Income (L4 * L1)	\$ 201,142	\$ 95,691
6	Operating Income Deficiency (L5 - L2)	\$ 213,899	\$ 116,431
7	Gross Revenue Conversion Factor	1.0000	1.0000
8	Required Revenue Increase (L7 * L6)	\$ 213,899	\$ 116,431
9	Adjusted Test Year Revenue	\$ 175,673	\$ 159,429
10	Proposed Annual Revenue (L8 + L9)	\$ 389,572	\$ 275,860
11	Required Increase in Revenue (%)	121.76%	73.03%
12	Rate of Return	30.55%	15.00%

References:

Column (A): Company Schedules from the Rate Application
Column (B): Staff Schedules JMM-2, JMM-7

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Schedule JMM-2

RATE BASE - ORIGINAL COST

LINE NO.		(A) COMPANY AS FILED	(B) STAFF ADJUSTMENTS	REF	(C) STAFF AS ADJUSTED
1	Plant in Service	\$ 985,549	\$ (14,869)	Adj no. 2 & 3	\$ 970,680
2	Less: Accumulated Depreciation	315,377	(12,991)	Adj no. 3	302,386
3	Net Plant in Service	<u>\$ 670,172</u>	<u>\$ (1,878)</u>		<u>\$ 668,294</u>
<u>LESS:</u>					
4	Contributions in Aid of Construction (CIAC)	\$ 21,719	\$ -		\$ 21,719
8	Customer Deposits	8,638	-		8,638
9	Deferred Income Tax Credits	-	-		-
<u>ADD:</u>					
10	1/24 Power	443	(443)	Adj no. 1	-
11	1/8 Operations & Maintenance	<u>18,053</u>	<u>(18,053)</u>	Adj no. 1	<u>-</u>
17	Original Cost Rate Base	<u>\$ 658,312</u>	<u>\$ (20,374)</u>		<u>\$ 637,938</u>

References:

Column (A), Company Schedule from the Rate Application
Column (B): Schedule JMM-3
Column (C): Column (A) + Column (B)

SUMMARY OF ORIGINAL COST RATE BASE ADJUSTMENTS

LINE NO.	ACCT. NO.	DESCRIPTION	[A] COMPANY AS FILED	[B] ADJ #1	[C] ADJ #2	[D] ADJ #3	[E] STAFF ADJUSTED
<u>PLANT IN SERVICE:</u>							
1							
2	301	Organization	\$ 198	\$ -	\$ -	\$ -	\$ 198
3	302	Franchises	-	-	-	-	-
4	303	Land and Land Rights	4,345	-	-	-	4,345
5	304	Structures & Improvements	5,918	-	-	-	5,918
6	305	Collecting & Impounding Reservoirs	-	-	-	-	-
7	306	Lakes, Rivers, Other Intakes	-	-	-	-	-
8	307	Wells and Springs	77,391	-	(38)	(12,991)	64,362
9	308	Infiltration Galleries and Tunnels	-	-	-	-	-
10	309	Supply Mains	-	-	-	-	-
11	310	Power Generation Equipment	-	-	-	-	-
12	311	Pumping Equipment	132,579	-	(20)	-	132,559
13	320	Water Treatment Plant	1,971	-	(147)	-	1,824
14	330	Distribution Reservoirs & Standpipes	136,659	-	(1,245)	-	135,414
15	331	Transmission & Distribution Mains	513,601	-	(416)	-	513,185
16	333	Services	37,950	-	-	-	37,950
17	334	Meters	28,060	-	-	-	28,060
18	335	Hydrants	34,717	-	-	-	34,717
19	336	Backflow Prevention Devices	-	-	-	-	-
20	339	Other Plant & Misc. Equipment	-	-	-	-	-
21	340	Office Furniture & Equipment	9,202	-	-	-	9,202
22	341	Transportation Equipment	-	-	-	-	-
23	342	Stores Equipment	-	-	-	-	-
24	343	Tools, Ship & Garage Equipment	140	-	(12)	-	128
25	344	Laboratory Equipment	-	-	-	-	-
26	345	Power Operated Equipment	2,818	-	-	-	2,818
27	346	Communication Equipment	-	-	-	-	-
28	347	Miscellaneous Equipment	-	-	-	-	-
29	348	Other Tangible Plant	-	-	-	-	-
30			985,549	-	(1,878)	(12,991)	970,680
31							
32	Add:						
33		Post Test Year Plant	-	-	-	-	-
34		General Office Plant Allocation	-	-	-	-	-
35	Less:						
36			-	-	-	-	-
37			-	-	-	-	-
38							
39	Total Plant in Service		\$ 985,549	\$ -	\$ (1,878)	\$ (12,991)	\$ 970,680
40	Less: Accumulated Depreciation		315,377	-	-	(12,991)	302,386
41	Accumulated Depreciation - General Office Plant Allocation		-	-	-	-	-
42	Net Plant in Service		\$ 670,172	\$ -	\$ (1,878)	\$ -	\$ 668,294
43							
44	LESS:						
45	Contributions in Aid of Construction (CIAC) (Less Amortization of CIAC)		\$ 21,719	\$ -	\$ -	\$ -	\$ 21,719
46	Customer Meter Deposits		8,638	-	-	-	8,638
47	Deferred Income Tax Credits		-	-	-	-	-
48							
49	ADD:						
50	1/24 Power		443	(443)	-	-	-
51	1/8 Operations & Maintenance		18,053	(18,053)	-	-	-
52							
53	Original Cost Rate Base		\$ 658,312	\$ (18,496)	\$ (1,878)	\$ -	\$ 637,938

ADJ #	References
1	Removal of Allowance for Cash Working Capital Schedule JMM-4
2	Removal of Plant in Service Surcharge Schedule JMM-5
3	Removal of Plant in Service and Accumulated Depreciation Schedule JMM-6

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Schedule JMM-4

RATE BASE ADJUSTMENT NO. 1 - REMOVAL OF ALLOWANCE FOR CASH WORKING CAPITAL

Line No.	Description	[A]	[B]	[C]
		COMPANY AS FILED	STAFF ADJUSTMENTS	STAFF AS ADJUSTED
1	Cash Working Capital (1/8 of allowance operation and maintenance expense)	\$ 443	\$ (443)	\$ -
2	Cash Working Capital (1/24/ of Power)	\$ 18,053	\$ (18,053)	\$ -

References:

Column A: Company Schedule from the Rate Application
Column B: Testimony, Schedule JMM-3
Column C: Column [A] + Column [B]

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Schedule JMM-5

RATE BASE ADJUSTMENT NO. 2 - REMOVAL OF PLANT IN SERVICE SURCHARGE

Line No.	Description	[A]	[B]	[C]
		COMPANY AS FILED	STAFF ADJUSTMENTS	STAFF AS ADJUSTED
1	Removal of Surcharge related to Wells and Springs (Account 307)	\$ 77,391	\$ (38)	\$ 77,353
2	Removal of Surcharge related to Water Treatment Plant (Account 320)	\$ 1,971	\$ (147)	\$ 1,824
3	Removal of Surcharge related to Distribution Reservoirs and Standpipes (Account 330)	\$ 136,659	\$ (1,245)	\$ 135,414
4	Removal of Surcharge related to Transmission and Distribution Mains (Account 331)	\$ 513,601	\$ (416)	\$ 513,185
5	Removal of Surcharge related to Tools, Shop and Garage Equipment (Account 343)	\$ 140	\$ (12)	\$ 128
6	Removal of Surcharge related to Pumps (Account 311)	\$ 132,579	\$ (20)	\$ 132,559

References:

Column A: Company Schedule from the Rate Application
Column B: Testimony, Schedule JMM-3
Column C: Column [A] + Column [B]

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Schedule JMM-6

RATE BASE ADJUSTMENT NO. 3 - REMOVAL OF PLANT IN SERVICE AND ACCUMULATED DEPRECIATION

		[A]	[B]	[C]	[D]
Line No.	Description	COMPANY AS FILED	STAFF ADJUSTMENTS	LESS: STAFF ADJUSTMENT NO. 2	STAFF AS ADJUSTED
1	Removal of Plant in Service	\$ 77,391	\$ (12,991)	\$ (38)	\$ 64,362
2	Removal of Accumulated Depreciation	\$ 315,377	\$ (12,991)	\$ -	\$ 302,386
<u>Staff's calculation from the Engineering Report</u>					
3	Removal of plant in service for Well # 1 due to abandonment	\$ 1,124			
4	Removal of plant in service for Well # 2 due to abandonment	1,565			
5	Removal of plant in service for Well # 3 due to abandonment	746			
6	Removal of plant in service for Well # 4 due to abandonment	7,927			
7	Removal of plant in service for Well # 5 due to abandonment	1,629			
8	Total amount removed from plant in service	\$ 12,991			

References:

Column A: Company Schedule from the Rate Application
Column B: Testimony, Schedule JMM-3
Column C: Column [A] + Column [B]

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Schedule JMM-7

OPERATING INCOME STATEMENT - ADJUSTED TEST YEAR AND STAFF RECOMMENDED

LINE NO.	DESCRIPTION	[A] COMPANY ADJUSTED TEST YEAR AS FILED	[B] STAFF TEST YEAR ADJUSTMENTS	REF	[C] STAFF TEST YEAR AS ADJUSTED	[D] STAFF PROPOSED CHANGES	[E] STAFF RECOMMENDED
1	<u>REVENUES:</u>						
2	Metered Water Sales	\$ 173,620	\$ (16,244)	Adj. no. 1	\$ 157,376	\$ 116,431	\$ 273,807
3	Water Sales - Unmetered	-	-		-	-	-
4	Other Operating Revenue	2,053	-		2,053	-	2,053
5	Total Operating Revenues	<u>\$ 175,673</u>	<u>\$ (16,244)</u>		<u>\$ 159,429</u>	<u>\$ 116,431</u>	<u>\$ 275,860</u>
6	<u>OPERATING EXPENSES:</u>						
7	Salaries and Wages	\$ 15,758	\$ -		\$ 15,758	\$ -	\$ 15,758
10	Purchased Water	-	-		-	-	-
11	Purchased Power	10,638	-		10,638	-	10,638
13	Chemicals	1,780	-		1,780	-	1,780
14	Repairs and Maintenance	18,691	-		18,691	-	18,691
15	Office Supplies and Expense	4,497	-		4,497	-	4,497
16	Outside Services	56,429	(1,870)	Adj. no. 2	54,559	-	54,559
17	Water Testing	3,600	6,230	Adj. no. 3	9,830	-	9,830
18	Rents	2,400	-		2,400	-	2,400
19	Transportation Expenses	5,969	-		5,969	-	5,969
20	Insurance - General Liability	3,312	-		3,312	-	3,312
21	Insurance - Health and Life	2,373	-		2,373	-	2,373
22	Regulatory Commission Expense - Rate Case	5,319	(2,196)	Adj. no. 4	3,123	-	3,123
23	Miscellaneous Expense	13,973	(13,973)	Adj. no. 7	-	-	-
24	Depreciation Expense	33,368	1,255	Adj. no. 5	34,623	-	34,623
25	Taxes Other Than Income	-	-		-	-	-
26	Property Taxes	10,323	2,293	Adj. no. 6	12,616	-	12,616
27	Income Tax	-	-		-	-	-
40							
41	Total Operating Expenses	<u>\$ 188,430</u>	<u>\$ (8,260)</u>		<u>\$ 180,170</u>	<u>\$ -</u>	<u>\$ 180,170</u>
42	Operating Income (Loss)	<u>\$ (12,757)</u>	<u>\$ (7,984)</u>		<u>\$ (20,741)</u>	<u>\$ 116,431</u>	<u>\$ 95,691</u>
43							
44	<u>Other Income (Expense)</u>						
45	Interest Income	\$ 374	\$ -		\$ 374	\$ -	\$ 374
46	Non-Utility Income	175	-		175	-	175
47	Non-Utility Expense	-	-		-	-	-
48	Interest Expense	(3,516)	(13,973)	Adj. no. 7	(17,489)	-	(17,489)
49	Total Other Income (Expense)	<u>\$ (2,967)</u>	<u>(13,973)</u>		<u>\$ (16,940)</u>	<u>\$ -</u>	<u>\$ (16,940)</u>
50							
51	Net Income (Loss)	<u>\$ (15,724)</u>	<u>\$ (21,957)</u>		<u>\$ (37,681)</u>	<u>\$ 116,431</u>	<u>\$ 78,751</u>

References:

Column (A): Company Schedule from the Rate Application
Column (B): Schedule JMM-8
Column (C): Column (A) + Column (B)
Column (D): Schedule JMM-1
Column (E): Column (C) + Column (D)

SUMMARY OF OPERATING INCOME STATEMENT ADJUSTMENTS - TEST YEAR

LINE NO.	DESCRIPTION	(A) COMPANY AS FILED	(B) Removal of all Revenue Surcharges ADJ #1	(C) Reclassification of Outside Services ADJ #2	(D) Water Testing ADJ #3	(E) Rate Case ADJ #4	(F) Deprec. Exp ADJ #5	(G) Property Tax ADJ #6	(H) Reclassification of Misc. Exp ADJ #7	(I) STAFF ADJUSTED
1	REVENUES:									
2	Metered Water Sales	\$ 173,620	\$ (16,244)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 157,376
3	Water Sales - Unmetered	-	-	-	-	-	-	-	-	-
4	Other Operating Revenue	2,053	-	-	-	-	-	-	-	2,053
5	Total Operating Revenues	\$ 175,673	\$ (16,244)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 159,429
6	OPERATING EXPENSES:									
7	Salaries and Wages	\$ 15,758	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 15,758
8	Purchased Water	-	-	-	-	-	-	-	-	-
9	Purchased Power	10,638	-	-	-	-	-	-	-	10,638
10	Chemicals	1,780	-	-	-	-	-	-	-	1,780
11	Repairs and Maintenance	18,691	-	-	-	-	-	-	-	18,691
12	Office Supplies and Expense	4,497	-	-	-	-	-	-	-	4,497
13	Outside Services	56,429	-	(1,870)	-	-	-	-	-	54,559
14	Water Testing	3,600	-	-	6,230	-	-	-	-	9,830
15	Rents	2,400	-	-	-	-	-	-	-	2,400
16	Transportation Expenses	5,969	-	-	-	-	-	-	-	5,969
17	Insurance - General Liability	3,312	-	-	-	-	-	-	-	3,312
18	Insurance - Health and Life	2,373	-	-	-	-	-	-	-	2,373
19	Regulatory Commission Expense - Rate Case	5,319	-	-	-	(2,196)	-	-	-	3,123
20	Miscellaneous Expense	13,973	-	-	-	-	-	-	(13,973)	-
21	Depreciation Expense	33,368	-	-	-	-	1,255	-	-	34,623
22	Taxes Other Than Income	-	-	-	-	-	-	-	-	-
23	Property Taxes	10,323	-	-	-	-	-	2,283	-	12,616
24	Income Tax	-	-	-	-	-	-	-	-	-
25	Total Operating Expenses	\$ 188,430	\$ -	\$ (1,870)	\$ 6,230	\$ (2,196)	\$ 1,255	\$ 2,283	\$ (13,973)	\$ 180,170
26	Operating Income (Loss)	\$ (12,757)	\$ (16,244)	\$ 1,870	\$ (6,230)	\$ 2,196	\$ (1,255)	\$ (2,283)	\$ 13,973	\$ (20,741)
27	OTHER INCOME/EXPENSE									
28	Interest and Dividend Income	\$ 374	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 374
29	Non-Utility Income	175	-	-	-	-	-	-	-	175
30	Non-Utility Expense	-	-	-	-	-	-	-	-	-
31	Interest Expense	(3,516)	-	-	-	-	-	-	-	(17,489)
32	Total Other Income/(Expense)	\$ (2,967)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ (13,973)	\$ (16,940)
33	Net Income/(Loss)	\$ (15,724)	\$ (16,244)	\$ 1,870	\$ (6,230)	\$ 2,196	\$ (1,255)	\$ (2,283)	\$ 13,973	\$ (37,681)

ADJ #	Reference:
1	Removal of all Revenue Surcharges
2	Schedule JMM-9
3	Reclassification of Outside Services
4	Schedule JMM-10
5	Water Testing Expense
6	Schedule JMM-11
7	Rate Case Expense
8	Schedule JMM-12
9	Depreciation Expense
10	Schedule JMM-13
11	Property Taxes
12	Schedule JMM-14
13	Reclassification of Miscellaneous Expense
14	Schedule JMM-15

Naco Water Company, LLC.
Docket Nos. W-02860A-06-0002 and
W-02860A-05-0727
Test Year Ended December 31, 2005

Schedule JMM-9

OPERATING INCOME ADJUSTMENT NO. 1 - REMOVAL OF ALL REVENUE SURCHARGES

Line No.	Description	[A]	[B]	[C]
		COMPANY AS FILED	STAFF ADJUSTMENTS	STAFF AS ADJUSTED
1	Metered Water Sales	\$ 173,620	\$ (16,244)	\$ 157,376
Staff's Calculation				
2	Removal of \$ 1.16 Surcharge from ACC Decision # 61070 related to the current Wifa Loan	\$ 4,427		
3	Removal of all Surcharge Amounts for the Month of August from ACC Decision # 67984	\$ 1,774		
4	Removal of all Surcharge Amounts for the Month of September through December from ACC Decision # 67984	\$ 10,043		
5	Total of all Surcharges	\$ 16,244		

References:

Column A: Company Schedule from the Rate Application
Column B: Testimony, Schedule JMM-9
Column C: Column [A] + Column [B]

Naco Water Company, LLC.
Docket Nos. W-02860A-06-0002 and
W-02860A-05-0727
Test Year Ended December 31, 2005

Schedule JMM-10

OPERATING INCOME ADJUSTMENT NO. 2 - RECLASSIFICATION OF OUTSIDE SERVICES TO RATE CASE EXPENSE

Line No.	Description	[A]	[B]	[C]
		COMPANY AS FILED	STAFF ADJUSTMENTS	STAFF AS ADJUSTED
1	Outside Services	\$ 56,429	\$ (1,870)	\$ 54,559
2	Reclassification of expenses included in outside services that should be included in rate case expense.	\$ 1,870		

References:

Column A: Company Schedule from the Rate Application
Column B: Testimony, Schedule JMM-9
Column C: Column [A] + Column [B]

Naco Water Company, LLC.
Docket Nos. W-02860A-06-0002 and
W-02860A-05-0727
Test Year Ended December 31, 2005

Schedule JMM-11

OPERATING INCOME ADJUSTMENT NO. 3 - WATER TESTING EXPENSE

Line No.	Description	[A]	[B]	[C]
		COMPANY AS FILED	STAFF ADJUSTMENTS	STAFF AS ADJUSTED
1	Water testing expense	\$ 3,600	\$ 6,230	\$ 9,830
2	Staff's recommended water testing expense from the Engineering Report.	\$ 9,830		

References:

Column A: Company Schedule from the Rate Application

Column B: Testimony, Schedule JMM-9

Column C: Column [A] + Column [B]

Naco Water Company, LLC.
Docket Nos. W-02860A-06-0002 and
W-02860A-05-0727
Test Year Ended December 31, 2005

Schedule JMM-12

OPERATING INCOME ADJUSTMENT NO. 4 - RATE CASE EXPENSE

Line No.	Description	[A]	[B]	[C]
		COMPANY AS FILED	STAFF ADJUSTMENTS	STAFF AS ADJUSTED
1	Rate case expense	\$ 5,319	\$ (2,196)	\$ 3,123
<u>Staff's calculation</u>				
2	Rate Case Expense	\$ 5,319		
3	Plus: Reclassification of Outside Services (See Adj no. 2)	\$ 1,870		
4	Plus: Amounts spent after 12/31/05	\$ 2,180		
5	Total Rate Case Expense	\$ 9,369		
5	Divided by the estimated amortization period in years	3		
6	Annual Rate Case Expense	\$ 3,123		
7	Company proposed rate case expense	\$ 5,319		
8	Adjustment to rate case expense	\$ (2,196)		

References:

Column A: Company Schedule from the Rate Application
Column B: Testimony, Schedule JMM-9
Column C: Column [A] + Column [B]

Naco Water Company, LLC.
Docket Nos. W-02860A-06-0002 and
W-02860A-05-0727
Test Year Ended December 31, 2005

Schedule JMM-13

OPERATING INCOME ADJUSTMENT NO. 5 - DEPRECIATION EXPENSE

Line No.	ACCT NO.	DESCRIPTION	AMOUNT	Projected RATE	EXPENSE
		Plant In Service			
1	301	Organization	\$ 198	0.00%	\$ -
2	302	Franchises	-	0.00%	-
3	303	Land and Land Rights	4,345	0.00%	-
4	304	Structures & Improvements	5,918	3.33%	197
5	305	Collecting & Impounding Reservoirs	-	2.50%	-
6	306	Lakes, Rivers, Other Intakes	-	2.50%	-
7	307	Wells and Springs	64,362	3.33%	2,143
8	308	Infiltration Galleries and Tunnels	-	6.67%	-
9	309	Supply Mains	-	2.00%	-
10	310	Power Generation Equipment	-	5.00%	-
11	311	Pumping Equipment	132,559	12.50%	16,570
12	320	Water Treatment Plant	1,824	3.33%	61
13	330	Distribution Reservoirs & Standpipes	135,414	2.22%	3,006
14	331	Transmission & Distribution Mains	513,185	2.00%	10,264
15	333	Services	37,950	3.33%	1,264
16	334	Meters	28,060	8.33%	2,337
17	335	Hydrants	34,717	2.00%	694
18	336	Backflow Prevention Devices	-	6.67%	-
19	339	Other Plant & Misc. Equipment	-	6.67%	-
20	340	Office Furniture & Equipment	9,202	6.67%	614
21	341	Transportation Equipment	-	20.00%	-
22	342	Stores Equipment	-	4.00%	-
23	343	Tools, Ship & Garage Equipment	128	5.00%	6
24	344	Laboratory Equipment	-	10.00%	-
25	345	Power Operated Equipment	2,818	5.00%	141
26	346	Communication Equipment	-	10.00%	-
27	347	Miscellaneous Equipment	-	10.00%	-
28	348	Other Tangible Plant	-	-	-
29		Subtotal General	\$ 970,680		\$ 37,297
30		Less: Amortization of Contributions	\$ 36,833	7.26%	(2,674)
31		Total Depreciation Expense			\$ 34,623
32		Company Proposed Test Year Depreciation Expense			\$ 33,368
33		Staff Recommended Adjustment to increase Depreciation Expense			\$ 1,255

Naco Water Company, LLC.
Docket Nos. W-02860A-06-0002 and
W-02860A-05-0727
Test Year Ended December 31, 2005

Schedule JMM-14

OPERATING INCOME ADJUSTMENT NO. 6 - PROPERTY TAXES

Line No.	Description	[A]		[B]		[C]	
		COMPANY AS FILED		STAFF ADJUSTMENTS		STAFF AS ADJUSTED	
1	Property taxes	\$	10,323	\$	2,293	\$	12,616

2 Staff's Calculation of Property Taxes to Reflect Proposed Revenues:

3	Adjusted test year revenues	\$	159,429
4	Adjusted test year revenues		159,429
5	Proposed revenues		275,860
6	Average of three year's of revenue	\$	198,239
7	Average of three year's of revenue, times 2	\$	396,479
8	Full cash value	\$	396,479
9	Assessment ratio (reflects 2006 and 2007 1/2% reductions in assessment ratio)		24%
10	Assessed value	\$	95,155
11	Property tax rate		0.1326
12	Property tax	\$	12,616
13	Tax on parcels		-
14	Staff recommended property tax	\$	12,616
15	Company proposed property tax expense	\$	10,323
16	Staff recommended adjustment to property taxes	\$	2,293

References:

Column A: Company Schedule from the Rate Application
Column B: Testimony, Schedule JMM-9
Column C: Column [A] + Column [B]

Naco Water Company, LLC.
Docket Nos. W-02860A-06-0002 and
W-02860A-05-0727
Test Year Ended December 31, 2005

Schedule JMM-15

OPERATING INCOME ADJUSTMENT NO. 7 - RECLASSIFICATION OF MISCELLANEOUS EXPENSE TO INTEREST EXPENSE

Line No.	Description	[A]		[B]		[C]	
		COMPANY AS FILED		STAFF ADJUSTMENTS		STAFF AS ADJUSTED	
1	Miscellaneous expense	\$	13,973	\$	(13,973)	\$	-
2	Interest expense	\$	3,516	\$	13,973	\$	17,489

Staff reclassified miscellaneous expense in the amount of \$13,973 from WIFA as interest expense

References:

Column A: Company Schedule from the Rate Application
Column B: Testimony, Schedule JMM-9
Column C: Column [A] + Column [B]

FINANCIAL ANALYSIS

Selected Financial Information Pro forma Includes Immediate Effects of the Proposed Long-term Debt

	[A] 12/31/2005 Test Year Operating Revenue Without Loan	[B] 12/31/2005 With Staff Recommended Revenue and Full Amount of Company Proposed Loan \$2,500,000	[C] 12/31/2005 With Staff Recommended Revenue and Staff's Recommended Loan \$450,000
1 Operating Income	\$ (20,741)	\$ 95,691	\$ 95,691
2 Depreciation & Amortization Expense	\$ 34,623	\$ 34,623	\$ 34,623
3 Income Tax Expense	\$ -	\$ -	\$ -
4 Interest Expense	\$ 16,360 (a)	\$ 154,585 (b)	\$ 41,240 (c)
5 Principal Repayment	\$ 31,317	\$ 101,155	\$ 43,888

TIER & DSC Calculation

TIER			
6 [1+3] + [4]	N/M	0.62	2.32
DSC			
7 [1+2+3] + [4+5]	0.29	0.51	1.53

Capital Structure

8 Short-term Debt	\$ 31,317 (d)	5.42%	\$ 101,156 (e)	3.29%	\$ 43,888 (f)	4.27%
9 Long-term Debt	\$ 419,296 (g)	72.59%	\$ 2,849,457 (h)	92.59%	\$ 856,725 (i)	83.37%
10 Equity	\$ 127,026 (j)	21.99%	\$ 127,026	4.13%	\$ 127,026	12.36%
11 Total Capital	\$ 577,639	100.00%	\$ 3,077,639	100.00%	\$ 1,027,639	100.00%

(a) WIFA Debt Service Invoice, dated April 17, 2006, for the existing loan shows \$268.28 for interest and \$1,095.04 for the WIFA Management Fee for a total monthly fee of \$1,363.32 or \$16,360 annually.

(b) The pro forma interest expense includes the first year of interest on the Company proposed debt and also includes the interest on the existing loan.

(c) The pro forma interest expense includes the first year of interest on the Staff recommended debt and also includes the interest on the existing loan.

(d) Staff recognized \$17,000 of funds provided by the owner as equity. The Company treats it as a short-term debt. The Company has no reasonable expectation that it will repay the loan. The \$31,317 is the Staff calculated current maturities on the \$450,613 ending loan balance.

(e) Includes \$31,317 in short-term debt and \$69,839 in projected current maturities on \$2.5 million long-term debt.

(f) Includes \$31,317 in short-term debt and \$12,571 in projected current maturities on \$450,000 long-term debt.

(g) The \$419,296 amount reflects the \$450,613 ending balance less projected current maturities on the debt (i.e., \$450,613 - \$31,317).

(h) Includes existing debt of \$419,296 and the balance at the end of the first year (i.e., \$2,430,161) for the 2.5 million in Company proposed debt.

(i) Includes existing debt of \$419,296 and the balance at the end of the first year (i.e., \$437,429) for the \$450,000 in Staff recommended debt.

(j) Includes \$110,026 in equity and \$17,000 that Staff removed from short-term debt.

N/M: Not Meaningful

FINANCIAL ANALYSIS

Selected Financial Information Pro forma Includes Immediate Effects of the Proposed Long-term Debt

	[A] 12/31/2005 Test Year Operating Revenue <u>Without Loan</u>	[B] 12/31/2005 With Staff Recommended Revenue and Full Amount of Company Proposed Loan <u>\$2,500,000 at zero percent interest</u>	[C] 12/31/2005 With Staff Recommended Revenue and Staff's Recommended Loan <u>\$750,000 at zero percent interest</u>
1 Operating Income	\$ (20,741)	\$ 95,691	\$ 95,691
2 Depreciation & Amortization Expense	\$ 34,623	\$ 34,623	\$ 34,623
3 Income Tax Expense	\$ -	\$ -	\$ -
4 Interest Expense	\$ 16,360 (a)	\$ 16,360 (b)	\$ 16,360 (c)
5 Principal Repayment	\$ 31,317	\$ 156,317	\$ 68,817

TIER & DSC Calculation

6 TIER [1+3] + [4]	N/M	5.85	5.85
7 DSC [1+2+3] + [4+5]	0.29	0.75	1.53

Capital Structure

8 Short-term Debt	\$ 31,317 (d)	5.42%	\$ 156,317 (e)	5.08%	\$ 68,817 (f)	5.18%
9 Long-term Debt	\$ 419,296 (g)	72.59%	\$ 2,794,296 (h)	90.79%	\$ 1,131,796 (i)	85.25%
10 Equity	\$ 127,026 (j)	21.99%	\$ 127,026	4.13%	\$ 127,026	9.57%
11 Total Capital	\$ 577,639	100.00%	\$ 3,077,639	100.00%	\$ 1,327,639	100.00%

(a) WIFA Debt Service Invoice, dated April 17, 2006, for the existing loan shows \$268.28 for interest and \$1,095.04 for the WIFA Management Fee for a total monthly fee of \$1,363.32 or \$16,360 annually.

(b) The pro forma interest expense includes zero interest on the Company proposed debt and also includes interest on the existing loan.

(c) The pro forma interest expense includes zero interest on the Staff recommended debt and also includes interest on the existing loan.

(d) Staff recognized \$17,000 of funds provided by the owner as equity. The Company treats it as a short-term debt. The Company has no reasonable expectation that it will repay the loan. The \$31,317 is the Staff calculated current maturities on the \$450,613 ending loan balance.

(e) Includes \$31,317 in short-term debt and \$125,000 in projected current maturities on \$2.5 million long-term debt.

(f) Includes \$31,317 in short-term debt and \$37,500 in projected current maturities on \$800,000 long-term debt.

(g) The \$419,296 amount reflects the \$450,613 ending balance less projected current maturities on the debt (i.e., \$450,613 - \$31,317).

(h) Includes existing debt of \$419,296 and the balance at the end of the first year (i.e., \$2,375,000) for the 2.5 million in Company proposed debt.

(i) Includes existing debt of \$419,296 and the balance at the end of the first year (i.e., \$712,500) for the \$800,000 in Staff recommended debt.

(j) Includes \$110,026 in equity and \$17,000 that Staff removed from short-term debt.

N/M: Not Meaningful

RATE DESIGN

	Present Rates	Company Proposed Rates	Staff Recommended Rates
Monthly Usage Charge			
5/8" Meter - All Classes	\$ 16.43	\$ 56.00	\$ 28.00
3/4" Meter - All Classes	16.43	56.00	28.00
1" Meter - All Classes	31.48	63.00	54.00
1½" Meter - All Classes	41.43	69.00	71.00
2" Meter - All Classes	48.30	74.00	83.00
3" Meter - All Classes	160.00	180.00	180.00
4" Meter - All Classes	260.00	285.00	285.00
6" Meter - All Classes	510.00	640.00	600.00
Commodity Rates			
5/8" Meter (Residential)			
Gallons Included in Minimum	-	-	-
Excess of Minimum - per 1,000 Gallons			
From 1 to 10,000 Gallons	\$ 2.83	N/A	N/A
Over 10,000 Gallons	4.18	N/A	N/A
From 1 to 3,000 Gallons	N/A	\$ 4.80	N/A
From 3,001 to 10,000 Gallons	N/A	5.80	N/A
Over 10,000 Gallons	N/A	6.75	N/A
From 1 to 3,000 Gallons	N/A	N/A	\$ 3.90
From 3,000 to 9,000 Gallons	N/A	N/A	5.96
Over 9,000 Gallons	N/A	N/A	7.15
5/8" Meter (Commercial)			
Gallons Included in Minimum	-	-	-
Excess of Minimum - per 1,000 Gallons			
From 1 to 10,000 Gallons	\$ 2.83	N/A	N/A
Over 10,000 Gallons	4.18	N/A	N/A
From 1 to 3,000 Gallons	N/A	4.80	N/A
From 3,001 to 10,000 Gallons	N/A	\$ 5.80	N/A
Over 10,000 Gallons	N/A	6.75	N/A
From 1 to 9,000 Gallons	N/A	N/A	\$ 5.96
Over 9,000 Gallons	N/A	N/A	7.15
3/4" Meter (Residential)			
Gallons Included in Minimum	-	-	-
Excess of Minimum - per 1,000 Gallons			
From 1 to 10,000 Gallons	\$ 2.83	N/A	N/A
Over 10,000 Gallons	4.18	N/A	N/A
From 1 to 3,000 Gallons	N/A	\$ 4.80	N/A
From 3,001 to 10,000 Gallons	N/A	5.80	N/A
Over 10,000 Gallons	N/A	6.75	N/A
From 1 to 3,000 Gallons	N/A	N/A	\$ 3.90
From 3,000 to 9,000 Gallons	N/A	N/A	5.96
Over 9,000 Gallons	N/A	N/A	7.15
3/4" Meter (Commercial)			
Gallons Included in Minimum	-	-	-
Excess of Minimum - per 1,000 Gallons			
From 1 to 10,000 Gallons	\$ 2.83	N/A	N/A
Over 10,000 Gallons	4.18	N/A	N/A
From 1 to 3,000 Gallons	N/A	4.80	N/A
From 3,001 to 10,000 Gallons	N/A	\$ 5.80	N/A
Over 10,000 Gallons	N/A	6.75	N/A
From 1 to 9,000 Gallons	N/A	N/A	\$ 5.96
Over 9,000 Gallons	N/A	N/A	7.15
1" Meter (Residential & Commercial)			
Gallons Included in Minimum	-	-	-
Excess of Minimum - per 1,000 Gallons			
From 1 to 10,000 Gallons	\$ 2.83	N/A	N/A
Over 10,000 Gallons	4.18	N/A	N/A
From 1 to 3,000 Gallons	N/A	\$ 4.80	N/A

	Present Rates	Company Proposed Rates	Staff Recommended Rates
From 3,001 to 10,000 Gallons	N/A	5.80	N/A
Over 10,000 Gallons	N/A	6.75	N/A
From 1 to 18,000 Gallons	N/A	N/A	\$ 5.96
Over 18,000 Gallons	N/A	N/A	7.15
1½" Meter (Residential & Commercial)			
Gallons Included in Minimum	-	-	-
Excess of Minimum - per 1,000 Gallons			
From 1 to 10,000 Gallons	\$ 2.83	N/A	N/A
Over 10,000 Gallons	4.18	N/A	N/A
From 1 to 3,000 Gallons	N/A	\$ 4.80	N/A
From 3,001 to 10,000 Gallons	N/A	5.80	N/A
Over 10,000 Gallons	N/A	6.75	N/A
From 1 to 30,000 Gallons	N/A	N/A	\$ 5.96
Over 30,000 Gallons	N/A	N/A	7.15
2" Meter (Residential & Commercial)			
Gallons Included in Minimum	-	-	-
Excess of Minimum - per 1,000 Gallons			
From 1 to 10,000 Gallons	\$ 2.83	N/A	N/A
Over 10,000 Gallons	4.18	N/A	N/A
From 1 to 3,000 Gallons	N/A	\$ 4.80	N/A
From 3,001 to 10,000 Gallons	N/A	5.80	N/A
Over 10,000 Gallons	N/A	6.75	N/A
From 1 to 35,000 Gallons	N/A	N/A	\$ 5.96
Over 35,000 Gallons	N/A	N/A	7.15
3" Meter (Residential & Commercial)			
Gallons Included in Minimum	-	-	-
Excess of Minimum - per 1,000 Gallons			
From 1 to 10,000 Gallons	\$ 2.83	N/A	N/A
Over 10,000 Gallons	4.18	N/A	N/A
From 1 to 3,000 Gallons	N/A	\$ 4.80	N/A
From 3,001 to 10,000 Gallons	N/A	5.80	N/A
Over 10,000 Gallons	N/A	6.75	N/A
From 1 to 100,000 Gallons	N/A	N/A	\$ 5.96
Over 100,000 Gallons	N/A	N/A	7.15
4" Meter (Residential & Commercial)			
Gallons Included in Minimum	-	-	-
Excess of Minimum - per 1,000 Gallons			
From 1 to 133,000 Gallons	\$ 2.83	N/A	N/A
Over 133,000 Gallons	4.18	N/A	N/A
From 1 to 3,000 Gallons	N/A	\$ 4.80	N/A
From 3,001 to 10,000 Gallons	N/A	5.80	N/A
Over 10,000 Gallons	N/A	6.75	N/A
From 1 to 150,000 Gallons	N/A	N/A	\$ 5.96
Over 150,000 Gallons	N/A	N/A	7.15
6" Meter (Residential & Commercial)			
Gallons Included in Minimum	-	-	-
Excess of Minimum - per 1,000 Gallons			
From 1 to 267,000 Gallons	\$ 2.83	N/A	N/A
Over 267,000 Gallons	4.18	N/A	N/A
From 1 to 3,000 Gallons	N/A	\$ 4.80	N/A
From 3,001 to 10,000 Gallons	N/A	5.80	N/A
Over 10,000 Gallons	N/A	6.75	N/A
From 1 to 300,000 Gallons	N/A	N/A	\$ 5.96
Over 300,000 Gallons	N/A	N/A	7.15
Service Line and Meter Installation Charges			
5/8" Meter	\$ 400	\$ 450	\$ 450
3/4" Meter	400	475	475
1" Meter	500	550	550
1½" Meter	715	775	775
2" Meter	1,305	1,375	1,375
3" Meter	1,815	1,975	1,975
4" Meter	2,860	3,040	3,040
6" Meter	5,275	5,635	5,635

	Present Rates	Company Proposed Rates	Staff Recommended Rates
<u>Service Charges</u>			
Establishment	\$ 25.00	\$ 35.00	\$ 30.00
Establishment (After Hours)	30.00	45.00	40.00
Reconnection (Delinquent)	25.00	35.00	30.00
Reconnection (After Hours)	-	45.00	40.00
Meter Test	30.00	45.00	30.00
Deposit Requirement (Residential)	*	*	*
Deposit Requirement (None Residential Meter)	*	*	*
Deposit Interest	*	*	*
Re-Establishment (Within 12 Months)	**	**	**
Re-Establishment (After Hours)	**	**	**
NSF Check	15.00	20.00	20.00
Deferred Payment, Per Month	1.5 % of Outstanding balance	1.5 % of Outstanding balance	1.5 % of Outstanding balance
Meter Re-Read	10.00	15.00	15.00
Charge of Moving Customer Meter - Customer Requested per Rule R14-2-405B	Cost	Cost	Cost

* Per Commission Rules (R14-2-403.B)

** Months off system times the minimum (R14-2-403.D)

In addition to the collection of regular rates, the utility will collect from its customers a proportionate share of any privilege, sales, use, and franchise tax. Per Commission Rule (14-2-409.D.5).

Typical Bill Analysis
General Service 5/8-Inch Meter

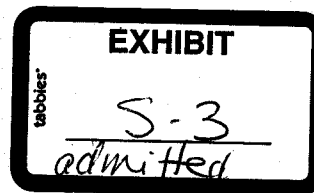
Company Proposed	Gallons	Present Rates	Present Rates with Surcharges	Proposed or Recommended Rates	Dollar Increase without Surcharge	Dollar Increase with Surcharge	Percent Increase without Surcharge	Present Rate Increase with Surcharge
Average Usage	6,585	\$35.07	\$42.73	\$91.19	\$56.13	\$48.47	160.06%	113.44%
Median Usage	5,272	31.35	39.01	83.58	52.23	44.57	166.60%	114.25%
Staff Recommended								
Average Usage	6,585	\$35.07	\$42.73	\$61.07	\$26.00	\$18.34	74.15%	42.93%
Median Usage	5,272	31.35	39.01	53.24	21.89	14.23	69.83%	36.48%

Present & Proposed Rates (Without Taxes)
General Service 5/8-Inch Meter

Gallons Consumption	Present Rates	Company Proposed Rates	% Increase	Staff Recommended Rates	% Increase	% Staff increase with Surcharges
-	\$16.43	\$56.00	240.84%	\$28.00	70.42%	16.23%
1,000	19.26	60.80	215.68%	31.90	65.63%	18.50%
2,000	22.09	65.60	196.97%	35.80	62.06%	20.34%
3,000	24.92	70.40	182.50%	39.70	59.31%	21.85%
4,000	27.75	76.20	174.59%	45.66	64.54%	28.95%
5,000	30.58	82.00	168.15%	51.62	68.80%	34.99%
6,000	33.41	87.80	162.80%	57.58	72.34%	40.20%
7,000	36.24	93.60	158.28%	63.54	75.33%	44.74%
8,000	39.07	99.40	154.42%	69.50	77.89%	48.73%
9,000	41.90	105.20	151.07%	75.46	80.10%	52.26%
10,000	44.73	111.00	148.16%	82.61	84.69%	57.68%
11,000	48.91	117.75	140.75%	89.76	83.52%	58.67%
12,000	53.09	124.50	134.51%	96.91	82.54%	59.52%
13,000	57.27	131.25	129.18%	104.06	81.70%	60.26%
14,000	61.45	138.00	124.57%	111.21	80.98%	60.92%
15,000	65.63	144.75	120.55%	118.36	80.34%	61.50%
16,000	69.81	151.50	117.02%	125.51	79.79%	62.01%
17,000	73.99	158.25	113.88%	132.66	79.29%	62.47%
18,000	78.17	165.00	111.08%	139.81	78.85%	62.89%
19,000	82.35	171.75	108.56%	146.96	78.46%	63.27%
20,000	86.53	178.50	106.29%	154.11	78.10%	63.62%
25,000	107.43	212.25	97.57%	189.86	76.73%	64.97%
30,000	128.33	246.00	91.69%	225.61	75.80%	65.90%
35,000	149.23	279.75	87.46%	261.36	75.14%	66.59%
40,000	170.13	313.50	84.27%	297.11	74.64%	67.11%
45,000	191.03	347.25	81.78%	332.86	74.24%	67.53%
50,000	211.93	381.00	79.78%	368.61	73.93%	67.86%
75,000	316.43	549.75	73.74%	547.36	72.98%	68.89%
100,000	420.93	718.50	70.69%	726.11	72.50%	69.42%

BEFORE THE ARIZONA CORPORATION COMMISSION

JEFF HATCH-MILLER
Chairman
WILLIAM A. MUNDELL
Commissioner
MIKE GLEASON
Commissioner
KRISTIN K. MAYES
Commissioner
BARRY WONG
Commissioner



IN THE MATTER OF THE APPLICATION OF
NACO WATER COMPANY, INC.,
AN ARIZONA CORPORATION, FOR A RATE
INCREASE & A FINANCING APPLICATION

) DOCKET NO. W-02860A-06-0002
) DOCKET NO. W-02860A-05-0727

SURREBUTTAL TESTIMONY

OF

DOROTHY HAINS

UTILITIES ENGINEER

UTILITIES DIVISION

OCTOBER 23, 2006

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I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Dorothy Hains. My business address is 1200 West Washington Street, Phoenix, Arizona 85007.

Q. Are you the same Dorothy Hains who has previously filed testimony in this Naco Water Company ("Company") rate proceeding?

A. Yes.

Q. What is the purpose of your surrebuttal testimony?

A. I will be providing Staff's response to one of three issues raised by the Company's witness, Ms. Bonnie O'Connor, in her rebuttal testimony filed on October 2, 2006. My response specifically addresses the Hydrogeologic Assessment Imperative for Phelps Dodge Settlement that Ms. O'Connor raised.

II. HYDROGEOLOGIC ASSESSMENT FOR PHELPS DODGE SETTLEMENT

Q. In your opinion, what is the purpose of a hydrogeology study?

A. Generally speaking, water companies, or landowners, or developers, etc. who seek to develop a new source, should hire a consultant to study the local and/or regional aquifer in the project area. This study should include, but not be limited to, well inventory, aquifer characteristics, water quality in the aquifer, ground water flow direction, potential production, aquifer depth etc. This must be done before the specialist can suggest where and how to drill a well.

1 **Q. Does Staff believe that the Southern Upper San Pedro River Hydrologic Assessment**
2 **("SUSPRHA") will improve the water loss condition in the Company's water**
3 **systems?**

4 **A.** No. The water loss problem is related to aging pipe, worn out meters and plant corrosion.
5 Two of the Company's water systems had 23% and 31% water loss during the test year.
6 A hydrologic assessment study will not provide solutions for reducing water loss in the
7 systems. Staff believes that the Company should handle the water loss through programs
8 such as pipeline repair and meter replacement.
9

10 **Q. Does Staff agree with the Company that SUSPRHA is imperative for Phelps Dodge**
11 **Settlement? Please explain.**

12 **A.** Yes. A sulfate plume, developing in the Bisbee Junction area, was discovered in 2005.
13 The plume has grown and is a threat to the Company's Bisbee Junction well. It is
14 believed that the plume is the result of continuous mining activity in the past century. The
15 Phelps Dodge Company ("Phelps Dodge") is the owner of local copper mines. The
16 SUSPRHA may determine the plume growth rate, identify the affected area and may also
17 suggest remediation options.
18

19 **Q. Please explain why Staff does not believe the Company should pay for this study**
20 **now.**

21 **A.** The southern upper San Pedro River covers an area from the head of the San Pedro River
22 in Mexico in the south, to Tombstone, Arizona in the north, Mule Mountains in the east, to
23 Huachuca Mountains in the west; approximately 1,225 square miles area located in two
24 countries. This study will be extremely expensive. Naco Water Company is not the only
25 water provider in the SUSPRHA area. Staff believes this study should be a joint
26 adventure for all affected water providers. In addition, Staff believes that Phelps Dodge

1 should pay for at least a portion, if not all of the hydrogeology assessment. It is Staff's
2 understanding that the Company is in the process of negotiating a remediation agreement
3 with Phelps Dodge. Staff believes that if the Company pays for any portion of the
4 SUSPRHA, it should do so in the next phase of this process. The Company should file
5 monthly reports explaining to this Commission where it is in its negotiations with Phelps
6 Dodge.

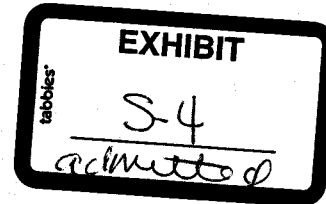
7
8 Based on the above and the fact the Company and its customers cannot afford to pay for
9 everything at once, Staff believes the water loss problem is more critical and should be
10 addressed first.

11
12 **Q. Does this conclude your surrebuttal testimony?**

13 **A. Yes, it does.**

BEFORE THE ARIZONA CORPORATION COMMISSION

JEFF HATCH-MILLER
Chairman
WILLIAM A. MUNDELL
Commissioner
MIKE GLEASON
Commissioner
KRISTIN K. MAYES
Commissioner
BARRY WONG
Commissioner



IN THE MATTER OF THE APPLICATION OF)
NACO WATER COMPANY, L.L.C.,)
AN ARIZONA LIMITED LIABILITY)
COMPANY, FOR PERMANENT)
INCREASES IN ITS WATER RATES AND)
CHARGES FOR UTILITY SERVICE WITHIN)
COCHISE COUNTY, ARIZONA)

DOCKET NO. W-02860A-06-0002

IN THE MATTER OF THE APPLICATION OF)
NACO WATER COMPANY, L.L.C.,)
AN ARIZONA LIMITED LIABILITY)
COMPANY, FOR APPROVAL OF)
FINANCING)

DOCKET NO. W-02860A-05-0727

SURREBUTTAL

TESTIMONY

OF

JEFFREY M. MICHLIK

PUBLIC UTILITIES ANALYST IV

UTILITIES DIVISION

ARIZONA CORPORATION COMMISSION

OCTOBER 23, 2006

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EXECUTIVE SUMMARY
NACO WATER COMPANY, LLC
DOCKET NOS. W-02860A-06-0002 AND W-02860A-05-0727

Rate Application:

Staff's surrebuttal testimony recommends revised rates that would increase operating revenue by \$126,282, to produce operating revenue of \$285,711, resulting in operating income of \$103,729, or a 79.21 percent increase over adjusted test year revenue of \$159,429. Staff recommends a fair value rate base ("FVRB") of \$637,938, and a 16.26 percent rate of return on the FVRB.

Finance Application:

Staff's surrebuttal testimony recommends authorization of a \$450,000 loan from WIFA over a 20-year period at an estimated 5.6 percent interest rate or a \$750,000 loan from WIFA over a 20-year period at a 0 percent interest rate. Staff's recommended operating revenues of \$285,711, would produce a times interest earned ratio ("TIER") of 6.34 and a debt service coverage ("DSC") ratio of 1.20.

Rate Design:

Staff's surrebuttal testimony recommends a revised typical 5/8-inch meter residential bill with median usage of 5,272 gallons would increase by \$23.92, or 76.30 percent from \$31.35 to \$55.27. However, the increase is less if we take into account the effect of the emergency rate increase and interim rate increase. For instance, after these factors are considered the typical 5/8-inch meter residential bill with median usage of 5,272 gallons would increase by \$16.26, or 41.68 percent from \$39.01 to \$55.27.

INTRODUCTION

Q. Please state your name, occupation, and business address.

A. My name is Jeffrey M. Michlik. I am a Public Utilities Analyst IV employed by the Arizona Corporation Commission ("ACC" or "Commission") in the Utilities Division ("Staff"). My business address is 1200 West Washington Street, Phoenix, Arizona 85007.

Q. Are you the same Jeffrey M. Michlik who filed direct testimony in this case?

A. Yes, I am.

Q. What is the purpose of your surrebuttal testimony in this proceeding?

A. The purpose of my surrebuttal testimony in this proceeding is to respond, on behalf of Staff, to the rebuttal testimony of Naco Water Company, LLC ("Company") witness Ms. Bonnie O'Conner, regarding rate base, operating revenues and expenses, revenue requirement, financing, and rate design.

Q. Please explain how Staff's surrebuttal testimony is organized?

A. Staff's surrebuttal testimony is generally organized to present issues in the same sequence as presented in the Company's rebuttal testimony.

RESPONSE TO THE COMPANY'S REBUTTAL TESTIMONY

Financing Application

Q. Please summarize the Company's financing request and Staff's recommendation.

A. The Company requested Commission authorization to incur approximately \$2.5 million in long-term debt to fund construction projects needed to address the Company's water loss, water quality, and system reliability concerns.

1 Staff recommended alternate loan amounts that are dependent upon the interest rate
2 obtained from the Water Infrastructure Financing Authority ("WIFA"). Staff
3 recommended \$750,000 if the Company could obtain a zero percent interest rate and
4 \$450,000 if it could not. The funds were intended to address the Company's water loss
5 problem.

6
7 **Q. What was the Company's response to Staff's recommendation?**

8 A. The Company rejected Staff's recommendation stating that:

9 A. The amount was insufficient to address the ongoing and worsening drinking water
10 supply condition.

11 B. Filing multiple new finance and rate applications for each phase is not cost effective.

12 C. The Phelps Dodge financial settlement has no certitude.

13 D. The hydrogeologic assessment is imperative for Phelps Dodge Settlement.

14 E. The ACC Debt Authorization is not consistent with the WIFA lending.

15 F. Staff removed wells from plant in service and the associated accumulated depreciation
16 from wells that were never placed in service.

17
18 **Q. Does Staff agree with any of the Company's arguments?**

19 A. No, except for the last issue (Plant in Service). Staff will address each argument
20 separately.

21
22 **Q. Did Staff intend for its recommended loan amount to fund all construction for
23 Naco's projects?**

24 A. No. The purpose of the loan recommended by Staff was to provide funds to address the
25 Company's first priority construction project - correcting its water loss problem.

1 **Q. Could correction of the Company's water loss problem impact the Company's other**
2 **planned construction projects?**

3 A. Yes, it could. Resolving the water loss problem may allow the Company to avoid or defer
4 the need to obtain new sources of water.

5
6 **Q. Did Staff base its recommended loan amount on the cost effectiveness of filing new**
7 **finance and rate applications for each phase?**

8 A. No, Staff did not.

9
10 **Q. What traditional ratemaking principles did Staff utilize in determining its**
11 **recommended loan amount?**

12 A. Staff utilized the principles of gradualism and affordability.

13
14 **Q. What is the median income for residents in the Naco service area?**

15 A. The median income for a household in Cochise County, Arizona is \$32,105.
16 Approximately 13.5 percent of the families and 17.7 percent of the population fall below
17 the poverty line.

18
19 **Q. Would Staff's recommended loan result in more affordable rates than would the**
20 **Company proposed \$2.5 million loan?**

21 A. Yes, it would. Perhaps the most important aspect of this analysis that has been ignored by
22 the Company, is the impact of dramatically raising the rates on the customers.

23
24 Based on the Company's bill count, the median usage in gallons for a 5/8-inch meter
25 customer is 5,272. Based on the median usage of 5,272 gallons, the typical monthly bill
26 for a 5/8-inch customer with the emergency surcharges included is \$39.01. Staff is

1 recommending increasing the typical 5/8-inch monthly bill to \$55.27 to accommodate the
2 \$450,000 loan. This is already a \$16.26, or a 42 percent increase over the current rates.
3 Using the Company's proposed rates, the typical monthly bill for a 5/8-inch customer
4 would be \$83.58, which is a \$44.57, or a 114% increase over the current rates as shown on
5 Staff's Surrebuttal Schedule JMM-19.
6

7 **Q. Does Staff agree that the Phelps Dodge Financial Settlement has no certitude?**

8 A. No, Staff agrees with the Company that there is uncertainty concerning the amount, if any,
9 that Phelps Dodge will provide for construction projects. However, it is unfair to
10 customers to place all of the risk that "Phelps Dodge will never pay" in Staff's
11 recommended rates. Further, Staff recognizes that the Company may take approximately
12 a year or longer to use the proceeds from Staff's recommended loan to correct the water
13 problems. During that time, the Company and Phelps Dodge may enter into some type of
14 an agreement.
15

16 **Q. Is Staff aware of any other water utility that has received funds from Phelps Dodge
17 to address its water problems?**

18 A. Yes, Community Water of Green Valley ("Community Water") has received funds from
19 Phelps Dodge to address the water problems caused by Phelps Dodge mining operations.
20 Community Water spends its own money to correct the problems and is reimbursed by
21 Phelps Dodge for some or all of the projects' cost. Community Water projects to receive
22 reimbursements of approximately \$14 million from Phelps Dodge.

1 **Q. Why did Staff not include the cost of the hydrogeological assessment in its**
2 **recommended loan amount?**

3 A. Staff based its recommended loan amount on the project identified as the most important
4 by both the Company and Staff - correcting the water loss problem. *See* Surrebuttal
5 Testimony of Dorothy Hains ("Hains ST").
6

7 **Q. Is Staff's DSC inconsistent with the DSC required by WIFA?**

8 A. No, it is not. Apparently, the Company has misunderstood the meaning of Staff's 1.53
9 DSC. The Company has interpreted Staff's recommendation to require it to maintain a
10 DSC higher than that required by WIFA. The Company also erroneously concludes that
11 with Staff's recommended revenue it could finance more debt than Staff recommended for
12 authorization since the resulting DSC would exceed the minimum DSC of 1.20 required
13 by WIFA. The Company's analysis did not take into account the reserve payment
14 requirement WIFA imposes on the debt that must be paid from the Company's operating
15 income.
16

17 **Q. WIFA requires a DSC ratio of 1.20 to facilitate WIFA lending, why is Staff's DSC**
18 **ratio at 1.53?**

19 A. Staff set the DSC ratio at 1.53 because the DSC ratio did not reflect additional WIFA
20 expenses such as the reserve fund and annual repair and maintenance fund. When these
21 additional cash obligations are added to the DSC ratio calculation they produce a DSC
22 ratio of 1.20. Therefore Staff is not imposing a higher DSC ratio. These changes are
23 reflected in Column C, line 6 of Staff's Surrebuttal Schedules JMM-16 and JMM-17.

1 **Q. Does Staff agree that ACC debt authorization is not consistent with WIFA Lending?**

2 A. No, Staff does not. Staff's calculation of its recommended loan and DSC is consistent
3 with WIFA's.

4
5 **Q. What interest rate did Staff utilize in its analysis?**

6 A. Staff's analysis used the most current interest rates in effect at this time, 5.60 percent.

7
8 **Q. Is this consistent with how WIFA calculates its interest rates?**

9 A. Yes, WIFA uses the prime rate plus 2 percent or a maximum of 8 percent. In this case
10 Staff used the maximum of 8 percent times the WIFA subsidy rate of .70 to derive an
11 interest rate of 5.60 percent over a 20-year period.

12
13 **Q. Could the interest rate change before the WIFA board authorizes the financing?**

14 A. Yes. WIFA representatives have conveyed to Staff that the interest rate is decided on a
15 case by case basis.

16
17 **Q. Why did Staff present alternate financing amounts?**

18 A. WIFA has in place certain rules which allow hardship cases to qualify for zero percent
19 interest loans. The purpose is to allow the WIFA board to have more flexibility when
20 authorizing a loan amount. In this case, the WIFA board can authorize a \$750,000 loan at
21 zero percent for 20 years if the Company qualifies for a hardship case, or a \$450,000 loan
22 at approximately 5.6 percent over 20 years.

23
24 **Q. Does Staff agree with the Company on the plant in service issues?**

25 A. Yes, Staff has reviewed a lease agreement between the Company and Southern Pacific
26 Railroad dated June 8, 1964, regarding well # 4, and agrees with the Company that it does

1 not own the well, and therefore agrees with the Company that it was never put into plant
2 in service and therefore cannot be taken out of plant in service. In regards, to well # 3 and
3 # 5 never being put into plant in service, the Company contends there are no records of the
4 wells being put into plant in service. As the total amount removed for both wells and the
5 associated depreciation is only \$2,375, and the inclusion or removal of these wells will
6 have a de minimis effect on rate base, Staff will not remove these two wells. Staff will
7 rely on the Company's rebuttal testimony that these two wells were never included in
8 plant in service. These changes are reflected on surrebuttal schedule JMM-6.

9
10 **Q. Would Staff please provide a brief recap of its surrebuttal testimony?**

11 A. The Company's engineering firm and Staff have agreed that water loss is the number one
12 concern at present and that it should be corrected immediately. At this point it is still
13 unclear whether the Company will receive any financial assistance from Phelps Dodge.
14 Therefore, Staff finds it imprudent to pass on the cost to develop new sources of water
15 supply to ratepayers who will already be experiencing rate shock. Most importantly, the
16 customers have been left out of the Company's equation, and are the ones who will be
17 paying for the system upgrades not the Company's engineering firm nor the Company.
18 Staff's recommended WIFA loan amount of \$450,000 (or \$750,000 assuming a zero
19 interest loan) will address the water loss problem while balancing the economic burden to
20 customers.

21
22 **Q. Does this conclude your surrebuttal testimony?**

23 A. Yes, it does.

Naco Water Company, LLC.
Docket Nos. W-02860A-06-0002 and
W-02860A-05-0727
Test Year Ended December 31, 2005

Surrebuttal Schedule JMM-1

REVENUE REQUIREMENT

LINE NO.	DESCRIPTION	(A) COMPANY ORIGINAL COST	(B) STAFF ORIGINAL COST
1	Adjusted Rate Base	\$ 658,312	\$ 637,938
2	Adjusted Operating Income (Loss)	\$ (12,757)	\$ (22,553)
3	Current Rate of Return (L2 / L1)	-1.94%	-3.54%
4	Required Rate of Return	30.55%	16.26%
5	Required Operating Income (L4 * L1)	\$ 201,142	\$ 103,729
6	Operating Income Deficiency (L5 - L2)	\$ 213,899	\$ 126,282
7	Gross Revenue Conversion Factor	1.0000	1.0000
8	Required Revenue Increase (L7 * L6)	\$ 213,899	\$ 126,282
9	Adjusted Test Year Revenue	\$ 175,673	\$ 159,429
10	Proposed Annual Revenue (L8 + L9)	\$ 389,572	\$ 285,711
11	Required Increase in Revenue (%)	121.76%	79.21%
12	Rate of Return	30.55%	16.26%

References:

Column (A): Company Schedules from the Rate Application
Column (B): Staff Schedules JMM-2, JMM-7

Naco Water Company, LLC.
Docket Nos. W-02860A-06-0002 and
W-02860A-05-0727
Test Year Ended December 31, 2005

Surrebuttal Schedule JMM-2

RATE BASE - ORIGINAL COST

LINE NO.	(A) COMPANY AS FILED	(B) STAFF ADJUSTMENTS	REF	(C) STAFF AS ADJUSTED
1	Plant in Service	\$ 985,549		\$ 980,982
2	Less: Accumulated Depreciation	315,377	Adj no. 2 & 3	312,688
3	Net Plant in Service	<u>\$ 670,172</u>	Adj no. 3	<u>\$ 668,294</u>
<u>LESS:</u>				
4	Contributions in Aid of Construction (CIAC)	\$ 21,719		\$ 21,719
8	Customer Deposits	8,638		8,638
9	Deferred Income Tax Credits	-		-
<u>ADD:</u>				
10	1/24 Power	443	(443) Adj no. 1	-
11	1/8 Operations & Maintenance	<u>18,053</u>	(18,053) Adj no. 1	<u>-</u>
17	Original Cost Rate Base	<u>\$ 658,312</u>	<u>\$ (20,374)</u>	<u>\$ 637,938</u>

References:

Column (A), Company Schedule from the Rate Application
Column (B): Schedule JMM-3
Column (C): Column (A) + Column (B)

Naco Water Company, LLC.
Docket Nos. W-02860A-06-0002 and
W-02860A-05-0727
Test Year Ended December 31, 2005

Surrebuttal Schedule JMM-3

SUMMARY OF ORIGINAL COST RATE BASE ADJUSTMENTS

LINE NO.	ACCT. NO.	DESCRIPTION	[A] COMPANY AS FILED	[B] ADJ #1	[C] ADJ #2	[D] ADJ #3	[E] STAFF ADJUSTED
<u>PLANT IN SERVICE:</u>							
1							
2	301	Organization	\$ 198	\$ -	\$ -	\$ -	\$ 198
3	302	Franchises	-	-	-	-	-
4	303	Land and Land Rights	4,345	-	-	-	4,345
5	304	Structures & Improvements	5,918	-	-	-	5,918
6	305	Collecting & Impounding Reservoirs	-	-	-	-	-
7	306	Lakes, Rivers, Other Intakes	-	-	-	-	-
8	307	Wells and Springs	77,391	-	(38)	(2,689)	74,664
9	308	Infiltration Galleries and Tunnels	-	-	-	-	-
10	309	Supply Mains	-	-	-	-	-
11	310	Power Generation Equipment	-	-	-	-	-
12	311	Pumping Equipment	132,579	-	(20)	-	132,559
13	320	Water Treatment Plant	1,971	-	(147)	-	1,824
14	330	Distribution Reservoirs & Standpipes	136,659	-	(1,245)	-	135,414
15	331	Transmission & Distribution Mains	513,601	-	(416)	-	513,185
16	333	Services	37,950	-	-	-	37,950
17	334	Meters	28,060	-	-	-	28,060
18	335	Hydrants	34,717	-	-	-	34,717
19	336	Backflow Prevention Devices	-	-	-	-	-
20	339	Other Plant & Misc. Equipment	-	-	-	-	-
21	340	Office Furniture & Equipment	9,202	-	-	-	9,202
22	341	Transportation Equipment	-	-	-	-	-
23	342	Stores Equipment	-	-	-	-	-
24	343	Tools, Ship & Garage Equipment	140	-	(12)	-	128
25	344	Laboratory Equipment	-	-	-	-	-
26	345	Power Operated Equipment	2,818	-	-	-	2,818
27	346	Communication Equipment	-	-	-	-	-
28	347	Miscellaneous Equipment	-	-	-	-	-
29	348	Other Tangible Plant	-	-	-	-	-
30			985,549	-	(1,878)	(2,689)	980,982
31							
32	Add:						
33		Post Test Year Plant	-	-	-	-	-
34		General Office Plant Allocation	-	-	-	-	-
35	Less:						
36			-	-	-	-	-
37			-	-	-	-	-
38							
39	Total Plant in Service		\$ 985,549	\$ -	\$ (1,878)	\$ (2,689)	980,982
40	Less: Accumulated Depreciation		315,377	-	-	(2,689)	312,688
41	Accumulated Depreciation - General Office Plant Allocation		-	-	-	-	-
42	Net Plant in Service		\$ 670,172	\$ -	\$ (1,878)	\$ -	\$ 668,294
43							
44	LESS:						
45	Contributions in Aid of Construction (CIAC) (Less Amortization of CIAC)		\$ 21,719	\$ -	\$ -	\$ -	\$ 21,719
46	Customer Meter Deposits		8,638	-	-	-	8,638
47	Deferred Income Tax Credits		-	-	-	-	-
48							
49	ADD:						
50	1/24 Power		443	(443)	-	-	-
51	1/8 Operations & Maintenance		18,053	(18,053)	-	-	-
52							
53	Original Cost Rate Base		\$ 658,312	\$ (18,496)	\$ (1,878)	\$ -	\$ 637,938

ADJ #	References
1	Removal of Allowance for Cash Working Capital Schedule JMM-4
2	Removal of Plant in Service Surcharge Schedule JMM-5
3	Removal of Plant in Service and Accumulated Depreciation Schedule JMM-6

Naco Water Company, LLC.
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Surrebuttal Schedule JMM-4

RATE BASE ADJUSTMENT NO. 1 - REMOVAL OF ALLOWANCE FOR CASH WORKING CAPITAL

Line No.	Description	[A]	[B]	[C]
		COMPANY AS FILED	STAFF ADJUSTMENTS	STAFF AS ADJUSTED
1	Cash Working Capital (1/8 of allowance operation and maintenance expense)	\$ 443	\$ (443)	\$ -
2	Cash Working Capital (1/24 of Power)	\$ 18,053	\$ (18,053)	\$ -

References:

Column A: Company Schedule from the Rate Application
Column B: Testimony, Schedule JMM-3
Column C: Column [A] + Column [B]

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Surrebuttal Schedule JMM-5

RATE BASE ADJUSTMENT NO. 2 - REMOVAL OF PLANT IN SERVICE SURCHARGE

Line No.	Description			
		[A]	[B]	[C]
		COMPANY AS FILED	STAFF ADJUSTMENTS	STAFF AS ADJUSTED
1	Removal of Surcharge related to Wells and Springs (Account 307)	\$ 77,391	\$ (38)	\$ 77,353
2	Removal of Surcharge related to Water Treatment Plant (Account 320)	\$ 1,971	\$ (147)	\$ 1,824
3	Removal of Surcharge related to Distribution Reservoirs and Standpipes (Account 330)	\$ 136,659	\$ (1,245)	\$ 135,414
4	Removal of Surcharge related to Transmission and Distribution Mains (Account 331)	\$ 513,601	\$ (416)	\$ 513,185
5	Removal of Surcharge related to Tools, Shop and Garage Equipment (Account 343)	\$ 140	\$ (12)	\$ 128
6	Removal of Surcharge related to Pumps (Account 311)	\$ 132,579	\$ (20)	\$ 132,559

References:

Column A: Company Schedule from the Rate Application
Column B: Testimony, Schedule JMM-3
Column C: Column [A] + Column [B]

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Surrebuttal Schedule JMM-6

RATE BASE ADJUSTMENT NO. 3 - REMOVAL OF PLANT IN SERVICE AND ACCUMULATED DEPRECIATION

Line No.	Description	[A]	[B]	[C]	[D]
		COMPANY AS FILED	STAFF ADJUSTMENTS	LESS: STAFF ADJUSTMENT NO. 2	STAFF AS ADJUSTED
1	Removal of Plant in Service	\$ 77,391	\$ (2,689)	\$ (38)	\$ 74,664
2	Removal of Accumulated Depreciation	\$ 315,377	\$ (2,689)	\$ -	\$ 312,688
<u>Staff's calculation from the Engineering Report</u>					
3	Removal of plant in service for Well # 1 due to abandonment	\$ 1,124			
4	Removal of plant in service for Well # 2 due to abandonment	\$ 1,565			
8	Total amount removed from plant in service	\$ 2,689			

References:

Column A: Company Schedule from the Rate Application
Column B: Testimony, Schedule JMM-3
Column C: Column [A] + Column [B]

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Surrebuttal Schedule JMM-7

OPERATING INCOME STATEMENT - ADJUSTED TEST YEAR AND STAFF RECOMMENDED

LINE NO.	DESCRIPTION	[A] COMPANY ADJUSTED TEST YEAR AS FILED	[B] STAFF TEST YEAR ADJUSTMENTS	REF	[C] STAFF TEST YEAR AS ADJUSTED	[D] STAFF PROPOSED CHANGES	[E] STAFF RECOMMENDED
1	REVENUES:						
2	Metered Water Sales	\$ 173,620	\$ (16,244)	Adj. no. 1	\$ 157,376	\$ 126,282	\$ 283,658
3	Water Sales - Unmetered	-	-		-	-	-
4	Other Operating Revenue	2,053	-		2,053	-	2,053
5	Total Operating Revenues	\$ 175,673	\$ (16,244)		\$ 159,429	\$ 126,282	\$ 285,711
6	OPERATING EXPENSES:						
7	Salaries and Wages	\$ 15,758	\$ -		\$ 15,758	\$ -	\$ 15,758
10	Purchased Water	-	-		-	-	-
11	Purchased Power	10,638	-		10,638	-	10,638
13	Chemicals	1,780	-		1,780	-	1,780
14	Repairs and Maintenance	18,691	-		18,691	-	18,691
15	Office Supplies and Expense	4,497	-		4,497	-	4,497
16	Outside Services	56,429	(1,870)	Adj. no. 2	54,559	-	54,559
17	Water Testing	3,600	6,230	Adj. no. 3	9,830	-	9,830
18	Rents	2,400	-		2,400	-	2,400
19	Transportation Expenses	5,969	-		5,969	-	5,969
20	Insurance - General Liability	3,312	-		3,312	-	3,312
21	Insurance - Health and Life	2,373	-		2,373	-	2,373
22	Regulatory Commission Expense - Rate Case	5,319	(2,196)	Adj. no. 4	3,123	-	3,123
23	Miscellaneous Expense	13,973	(13,973)	Adj. no. 7	-	-	-
24	Depreciation Expense	33,368	2,859	Adj. no. 5	36,227	-	36,227
25	Taxes Other Than Income	-	-		-	-	-
26	Property Taxes	10,323	2,502	Adj. no. 6	12,825	-	12,825
27	Income Tax	-	-		-	-	-
40							
41	Total Operating Expenses	\$ 188,430	\$ (6,448)		\$ 181,982	\$ -	\$ 181,982
42	Operating Income (Loss)	\$ (12,757)	\$ (9,796)		\$ (22,553)	\$ 126,282	\$ 103,729
43							
44	Other Income (Expense)						
45	Interest Income	\$ 374	\$ -		\$ 374	\$ -	\$ 374
46	Non-Utility Income	175	-		175	-	175
47	Non-Utility Expense	-	-		-	-	-
48	Interest Expense	(3,516)	(13,973)	Adj. no. 7	(17,489)	-	(17,489)
49	Total Other Income (Expense)	\$ (2,967)	(13,973)		\$ (16,940)	\$ -	\$ (16,940)
50							
51	Net Income (Loss)	\$ (15,724)	\$ (23,769)		\$ (39,493)	\$ 126,282	\$ 86,789

References:

Column (A): Company Schedule from the Rate Application
Column (B): Schedule JMM-8
Column (C): Column (A) + Column (B)
Column (D): Schedule JMM-1
Column (E): Column (C) + Column (D)

SUMMARY OF OPERATING INCOME STATEMENT ADJUSTMENTS - TEST YEAR

LINE NO.	DESCRIPTION	(A) COMPANY AS FILED	(B) Removal of all Revenue Surcharges ADJ #1	(C) Reclassification of Outside Services ADJ #2	(D) Water Testing ADJ #3	(E) Rate Case ADJ #4	(F) Deprec. Exp ADJ #5	(G) Property Tax ADJ #6	(H) Reclassification of Misc. Exp ADJ #7	(I) STAFF ADJUSTED
1	REVENUES:									
2	Metered Water Sales	\$ 173,620	\$ (16,244)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 157,376
3	Water Sales - Unmetered	2,053	-	-	-	-	-	-	-	2,053
4	Other Operating Revenue									
5	Total Operating Revenues	\$ 175,673	\$ (16,244)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 159,429
6	OPERATING EXPENSES:									
7	Salaries and Wages	\$ 15,758	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 15,758
8	Purchased Water	-	-	-	-	-	-	-	-	-
9	Purchased Power	10,638	-	-	-	-	-	-	-	10,638
10	Chemicals	1,780	-	-	-	-	-	-	-	1,780
11	Repairs and Maintenance	18,691	-	-	-	-	-	-	-	18,691
12	Office Supplies and Expense	4,487	-	-	-	-	-	-	-	4,487
13	Outside Services	56,429	-	(1,870)	-	-	-	-	-	54,559
14	Water Testing	3,600	-	-	6,230	-	-	-	-	9,830
15	Rents	2,400	-	-	-	-	-	-	-	2,400
16	Transportation Expenses	5,969	-	-	-	-	-	-	-	5,969
17	Insurance - General Liability	3,312	-	-	-	-	-	-	-	3,312
18	Insurance - Health and Life	2,373	-	-	-	-	-	-	-	2,373
19	Regulatory Commission Expense - Rate Case	5,319	-	-	-	(2,196)	-	-	-	3,123
20	Miscellaneous Expense	13,973	-	-	-	-	-	-	(13,973)	-
21	Depreciation Expense	33,368	-	-	-	-	2,859	-	-	36,227
22	Taxes Other Than Income	-	-	-	-	-	-	-	-	-
23	Property Taxes	10,323	-	-	-	-	-	2,502	-	12,825
24	Income Tax	-	-	-	-	-	-	-	-	-
25	Total Operating Expenses	\$ 188,430	\$ -	\$ (1,870)	\$ 6,230	\$ (2,196)	\$ 2,859	\$ 2,502	\$ (13,973)	\$ 181,982
26	Operating Income (Loss)	\$ (12,757)	\$ (16,244)	\$ 1,870	\$ (6,230)	\$ 2,196	\$ (2,859)	\$ (2,502)	\$ 13,973	\$ (22,553)
27	OTHER INCOME/EXPENSE:									
28	Interest and Dividend Income	\$ 374	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 374
29	Non-Utility Income	175	-	-	-	-	-	-	-	175
30	Non-Utility Expense	-	-	-	-	-	-	-	-	-
31	Interest Expense	(3,516)	-	-	-	-	-	-	(13,973)	(17,489)
32	Total Other Income/Expense	\$ (2,967)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ (16,940)
33	Net Income/(Loss)	\$ (15,724)	\$ (16,244)	\$ 1,870	\$ (6,230)	\$ 2,196	\$ (2,859)	\$ (2,502)	\$ 13,973	\$ (39,493)

ADJ #	Reference:
1	Removal of all Revenue Surcharges
2	Schedule JMM-9
3	Reclassification of Outside Services
4	Schedule JMM-10
5	Water Testing Expense
6	Schedule JMM-11
7	Rate Case Expense
8	Schedule JMM-12
9	Depreciation Expense
10	Schedule JMM-13
11	Property Taxes
12	Schedule JMM-14
13	Reclassification of Miscellaneous Expense
14	Schedule JMM-15

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Surrebuttal Schedule JMM-9

OPERATING INCOME ADJUSTMENT NO. 1 - REMOVAL OF ALL REVENUE SURCHARGES

Line No.	Description	[A]	[B]	[C]
		COMPANY AS FILED	STAFF ADJUSTMENTS	STAFF AS ADJUSTED
1	Metered Water Sales	\$ 173,620	\$ (16,244)	\$ 157,376
	Staff's Calculation			
2	Removal of \$ 1.16 Surcharge from ACC Decision # 61070 related to the current Wifa Loan	\$ 4,427		
3	Removal of all Surcharge Amounts for the Month of August from ACC Decision # 67984	\$ 1,774		
4	Removal of all Surcharge Amounts for the Month of September through December from ACC Decision # 67984	\$ 10,043		
5	Total of all Surcharges	\$ 16,244		

References:

Column A: Company Schedule from the Rate Application
Column B: Testimony, Schedule JMM-9
Column C: Column [A] + Column [B]

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Surrebuttal Schedule JMM-10

OPERATING INCOME ADJUSTMENT NO. 2 - RECLASSIFICATION OF OUTSIDE SERVICES TO RATE CASE EXPENSE

Line No.	Description	[A]	[B]	[C]
		COMPANY AS FILED	STAFF ADJUSTMENTS	STAFF AS ADJUSTED
1	Outside Services	\$ 56,429	\$ (1,870)	\$ 54,559
2	Reclassification of expenses included in outside services that should be included in rate case expense.	\$ 1,870		

References:

Column A: Company Schedule from the Rate Application
Column B: Testimony, Schedule JMM-9
Column C: Column [A] + Column [B]

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Surrebuttal Schedule JMM-11

OPERATING INCOME ADJUSTMENT NO. 3 - WATER TESTING EXPENSE

Line No.	Description	[A]	[B]	[C]
		COMPANY AS FILED	STAFF ADJUSTMENTS	STAFF AS ADJUSTED
1	Water testing expense	\$ 3,600	\$ 6,230	\$ 9,830
2	Staff's recommended water testing expense from the Engineering Report.	\$ 9,830		

References:

Column A: Company Schedule from the Rate Application

Column B: Testimony, Schedule JMM-9

Column C: Column [A] + Column [B]

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Surrebuttal Schedule JMM-12

OPERATING INCOME ADJUSTMENT NO. 4 - RATE CASE EXPENSE

Line No.	Description	[A]	[B]	[C]
		COMPANY AS FILED	STAFF ADJUSTMENTS	STAFF AS ADJUSTED
1	Rate case expense	\$ 5,319	\$ (2,196)	\$ 3,123
	Staff's calculation			
2	Rate Case Expense	\$ 5,319		
3	Plus: Reclassification of Outside Services (See Adj no. 2)	\$ 1,870		
4	Plus: Amounts spent after 12/31/05	\$ 2,180		
5	Total Rate Case Expense	\$ 9,369		
5	Divided by the estimated amortization period in years	3		
6	Annual Rate Case Expense	\$ 3,123		
7	Company proposed rate case expense	\$ 5,319		
8	Adjustment to rate case expense	\$ (2,196)		

References:

Column A: Company Schedule from the Rate Application
Column B: Testimony, Schedule JMM-9
Column C: Column [A] + Column [B]

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Surrebuttal Schedule JMM-13

OPERATING INCOME ADJUSTMENT NO. 5 - DEPRECIATION EXPENSE

Line No.	ACCT NO.	DESCRIPTION	AMOUNT	Projected RATE	EXPENSE
		Plant In Service			
1	301	Organization	\$ 198	0.00%	\$ -
2	302	Franchises	-	0.00%	-
3	303	Land and Land Rights	4,345	0.00%	-
4	304	Structures & Improvements	5,918	3.33%	197
5	305	Collecting & Impounding Reservoirs	-	2.50%	-
6	306	Lakes, Rivers, Other Intakes	-	2.50%	-
7	307	Wells and Springs	74,664	3.33%	2,486
8	308	Infiltration Galleries and Tunnels	-	6.67%	-
9	309	Supply Mains	-	2.00%	-
10	310	Power Generation Equipment	-	5.00%	-
11	311	Pumping Equipment	132,559	12.50%	16,570
12	320	Water Treatment Plant	1,824	3.33%	61
13	330	Distribution Reservoirs & Standpipes	135,414	2.22%	3,006
14	331	Transmission & Distribution Mains	513,185	2.00%	10,264
15	333	Services	37,950	3.33%	1,264
16	334	Meters	28,060	8.33%	2,337
17	335	Hydrants	34,717	2.00%	694
18	336	Backflow Prevention Devices	-	6.67%	-
19	339	Other Plant & Misc. Equipment	-	6.67%	-
20	340	Office Furniture & Equipment	9,202	6.67%	614
21	341	Transportation Equipment	-	20.00%	-
22	342	Stores Equipment	-	4.00%	-
23	343	Tools, Shop & Garage Equipment	128	5.00%	6
24	344	Laboratory Equipment	-	10.00%	-
25	345	Power Operated Equipment	2,818	5.00%	141
26	346	Communication Equipment	-	10.00%	-
27	347	Miscellaneous Equipment	-	10.00%	-
28	348	Other Tangible Plant	-	-	-
29		Subtotal General	\$ 980,982		\$ 37,640
30		Less: Amortization of Contributions	\$ 36,833	3.84%	(1,413)
31		Total Depreciation Expense			\$ 36,227
32		Company Proposed Test Year Depreciation Expense			\$ 33,368
33		Staff Recommended Adjustment to increase Depreciation Expense			\$ 2,859

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Surrebuttal Schedule JMM-14

OPERATING INCOME ADJUSTMENT NO. 6 - PROPERTY TAXES

Line No.	Description	[A]	[B]	[C]
		COMPANY AS FILED	STAFF ADJUSTMENTS	STAFF AS ADJUSTED
1	Property taxes	\$ 10,323	\$ 2,502	\$ 12,825

2 Staff's Calculation of Property Taxes to Reflect Proposed Revenues:

3	Adjusted test year revenues	\$ 159,429
4	Adjusted test year revenues	159,429
5	Proposed revenues	285,711
6	Average of three year's of revenue	\$ 201,523
7	Average of three year's of revenue, times 2	\$ 403,046
8	Full cash value	\$ 403,046
9	Assessment ratio (reflects 2006 and 2007 1/2% reductions in assessment ratio)	24%
10	Assessed value	\$ 96,731
11	Property tax rate	0.1326
12	Property tax	\$ 12,825
13	Tax on parcels	-
14	Staff recommended property tax	\$ 12,825
15	Company proposed property tax expense	\$ 10,323
16	Staff recommended adjustment to property taxes	\$ 2,502

References:

Column A: Company Schedule from the Rate Application
Column B: Testimony, Schedule JMM-9
Column C: Column [A] + Column [B]

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Surrebuttal Schedule JMM-15

OPERATING INCOME ADJUSTMENT NO. 7 - RECLASSIFICATION OF MISCELLANEOUS EXPENSE TO INTEREST EXPENSE

Line No.	Description	[A]		[B]		[C]	
		COMPANY AS FILED		STAFF ADJUSTMENTS		STAFF AS ADJUSTED	
1	Miscellaneous expense	\$	13,973	\$	(13,973)	\$	-
2	Interest expense	\$	3,516	\$	13,973	\$	17,489

Staff reclassified miscellaneous expense in the amount of \$13,973 from WIFA as interest expense

References:

Column A: Company Schedule from the Rate Application
Column B: Testimony, Schedule JMM-9
Column C: Column [A] + Column [B]

FINANCIAL ANALYSIS

Selected Financial Information Pro forma Includes Immediate Effects of the Proposed Long-term Debt

	[A] 12/31/2005 Test Year Operating Revenue Without Loan	[B] 12/31/2005 With Staff Recommended Revenue and Full Amount of Company Proposed Loan \$2,500,000	[C] 12/31/2005 With Staff Recommended Revenue and Staff's Recommended Loan \$450,000
1 Operating Income	\$ (22,553)	\$ 103,729	\$ 103,729
2 Depreciation & Amortization Expense	\$ 36,227	\$ 36,227	\$ 36,227
3 Income Tax Expense	\$ -	\$ -	\$ -
4 Interest Expense	\$ 16,360 (a)	\$ 154,585 (b)	\$ 41,240 (c)
5 Principal Repayment	\$ 31,317	\$ 101,155	\$ 43,888
6 Additional WIFA Requirements			\$ 31,420

TIER & DSC Calculation

7 TIER [1+3] + [4]	N/M	0.67	2.52
8 DSC [1+2+3] + [4+5+6]	0.29	0.55	1.20

Capital Structure

9 Short-term Debt	\$ 31,317 (d)	5.42%	\$ 101,156 (e)	3.29%	\$ 43,888 (f)	4.27%
10 Long-term Debt	\$ 419,296 (g)	72.59%	\$ 2,849,457 (h)	92.59%	\$ 856,725 (i)	83.37%
11 Equity	\$ 127,026 (j)	21.99%	\$ 127,026	4.13%	\$ 127,026	12.36%
12 Total Capital	\$ 577,639	100.00%	\$ 3,077,639	100.00%	\$ 1,027,639	100.00%

(a) WIFA Debt Service Invoice, dated April 17, 2006, for the existing loan shows \$268.28 for interest and \$1,095.04 for the WIFA Management Fee for a total monthly fee of \$1,363.32 or \$16,360 annually.

(b) The pro forma interest expense includes the first year of interest on the Company proposed debt and also includes the interest on the existing loan.

(c) The pro forma interest expense includes the first year of interest on the Staff recommended debt and also includes the interest on the existing loan.

(d) Staff recognized \$17,000 of funds provided by the owner as equity. The Company treats it as a short-term debt. The Company has no reasonable expectation that it will repay the loan. The \$31,317 is the Staff calculated current maturities on the \$450,613 ending loan balance.

(e) Includes \$31,317 in short-term debt and \$69,839 in projected current maturities on \$2.5 million long-term debt.

(f) Includes \$31,317 in short-term debt and \$12,571 in projected current maturities on \$450,000 long-term debt.

(g) The \$419,296 amount reflects the \$450,613 ending balance less projected current maturities on the debt (i.e., \$450,613 - \$31,317).

(h) Includes existing debt of \$419,296 and the balance at the end of the first year (i.e., \$2,430,161) for the 2.5 million in Company proposed debt.

(i) Includes existing debt of \$419,296 and the balance at the end of the first year (i.e., \$437,429) for the \$450,000 in Staff recommended debt.

(j) Includes \$110,026 in equity and \$17,000 that Staff removed from short-term debt.

N/M: Not Meaningful

FINANCIAL ANALYSIS

Selected Financial Information Pro forma Includes Immediate Effects of the Proposed Long-term Debt

	[A] 12/31/2005 Test Year Operating Revenue <u>Without Loan</u>	[B] 12/31/2005 With Staff Recommended Revenue and Full Amount of Company Proposed Loan <u>\$2,500,000 at zero percent interest</u>	[C] 12/31/2005 With Staff Recommended Revenue and Staff's Recommended Loan <u>\$750,000 at zero percent interest</u>
1 Operating Income	\$ (22,553)	\$ 103,729	\$ 103,729
2 Depreciation & Amortization Expense	\$ 36,227	\$ 36,227	\$ 36,227
3 Income Tax Expense	\$ -	\$ -	\$ -
4 Interest Expense	\$ 16,360 (a)	\$ 16,360 (b)	\$ 16,360 (c)
5 Principal Repayment	\$ 31,317	\$ 156,317	\$ 68,817
6 Additional WIFA Requirements			\$ 31,652
TIER & DSC Calculation			
7 TIER [1+3] ÷ [4]	N/M	6.34	6.34
8 DSC [1+2+3] ÷ [4+5+6]	0.29	0.81	1.20
Capital Structure			
9 Short-term Debt	\$ 31,317 (d) 5.42%	\$ 156,317 (e) 5.08%	\$ 68,817 (f) 5.18%
10 Long-term Debt	\$ 419,296 (g) 72.59%	\$ 2,794,296 (h) 90.79%	\$ 1,131,796 (i) 85.25%
11 Equity	\$ 127,026 (j) 21.99%	\$ 127,026 4.13%	\$ 127,026 9.57%
12 Total Capital	\$ 577,639 100.00%	\$ 3,077,639 100.00%	\$ 1,327,639 100.00%

(a) WIFA Debt Service Invoice, dated April 17, 2006, for the existing loan shows \$268.28 for interest and \$1,095.04 for the WIFA Management Fee for a total monthly fee of \$1,363.32 or \$16,360 annually.

(b) The pro forma interest expense includes zero interest on the Company proposed debt and also includes interest on the existing loan.

(c) The pro forma interest expense includes zero interest on the Staff recommended debt and also includes interest on the existing loan.

(d) Staff recognized \$17,000 of funds provided by the owner as equity. The Company treats it as a short-term debt. The Company has no reasonable expectation that it will repay the loan. The \$31,317 is the Staff calculated current maturities on the \$450,613 ending loan balance.

(e) Includes \$31,317 in short-term debt and \$125,000 in projected current maturities on \$2.5 million long-term debt.

(f) Includes \$31,317 in short-term debt and \$37,500 in projected current maturities on \$800,000 long-term debt.

(g) The \$419,296 amount reflects the \$450,613 ending balance less projected current maturities on the debt (i.e., \$450,613 - \$31,317).

(h) Includes existing debt of \$419,296 and the balance at the end of the first year (i.e., \$2,375,000) for the 2.5 million in Company proposed debt.

(i) Includes existing debt of \$419,296 and the balance at the end of the first year (i.e., \$712,500) for the \$800,000 in Staff recommended debt.

(j) Includes \$110,026 in equity and \$17,000 that Staff removed from short-term debt.

N/M: Not Meaningful

RATE DESIGN

	Present Rates	Company Proposed Rates	Staff Recommended Rates
Monthly Usage Charge			
5/8" Meter - All Classes	\$ 16.43	\$ 56.00	\$ 29.00
3/4" Meter - All Classes	16.43	56.00	29.00
1" Meter - All Classes	31.48	63.00	56.00
1 1/2" Meter - All Classes	41.43	69.00	74.00
2" Meter - All Classes	48.30	74.00	87.00
3" Meter - All Classes	160.00	180.00	180.00
4" Meter - All Classes	260.00	285.00	285.00
6" Meter - All Classes	510.00	640.00	600.00
Commodity Rates			
5/8" Meter (Residential)			
Gallons Included in Minimum	-	-	-
Excess of Minimum - per 1,000 Gallons			
From 1 to 10,000 Gallons	\$ 2.83	N/A	N/A
Over 10,000 Gallons	4.18	N/A	N/A
From 1 to 3,000 Gallons	N/A	\$ 4.80	N/A
From 3,001 to 10,000 Gallons	N/A	5.80	N/A
Over 10,000 Gallons	N/A	6.75	N/A
From 1 to 3,000 Gallons	N/A	N/A	\$ 4.10
From 3,000 to 9,000 Gallons	N/A	N/A	6.15
Over 9,000 Gallons	N/A	N/A	7.38
5/8" Meter (Commercial)			
Gallons Included in Minimum	-	-	-
Excess of Minimum - per 1,000 Gallons			
From 1 to 10,000 Gallons	\$ 2.83	N/A	N/A
Over 10,000 Gallons	4.18	N/A	N/A
From 1 to 3,000 Gallons	N/A	4.80	N/A
From 3,001 to 10,000 Gallons	N/A	\$ 5.80	N/A
Over 10,000 Gallons	N/A	6.75	N/A
From 1 to 9,000 Gallons	N/A	N/A	\$ 6.15
Over 9,000 Gallons	N/A	N/A	7.38
3/4" Meter (Residential)			
Gallons Included in Minimum	-	-	-
Excess of Minimum - per 1,000 Gallons			
From 1 to 10,000 Gallons	\$ 2.83	N/A	N/A
Over 10,000 Gallons	4.18	N/A	N/A
From 1 to 3,000 Gallons	N/A	\$ 4.80	N/A
From 3,001 to 10,000 Gallons	N/A	5.80	N/A
Over 10,000 Gallons	N/A	6.75	N/A
From 1 to 3,000 Gallons	N/A	N/A	\$ 4.10
From 3,000 to 9,000 Gallons	N/A	N/A	6.15
Over 9,000 Gallons	N/A	N/A	7.38
3/4" Meter (Commercial)			
Gallons Included in Minimum	-	-	-
Excess of Minimum - per 1,000 Gallons			
From 1 to 10,000 Gallons	\$ 2.83	N/A	N/A
Over 10,000 Gallons	4.18	N/A	N/A
From 1 to 3,000 Gallons	N/A	4.80	N/A
From 3,001 to 10,000 Gallons	N/A	\$ 5.80	N/A
Over 10,000 Gallons	N/A	6.75	N/A
From 1 to 9,000 Gallons	N/A	N/A	\$ 6.15
Over 9,000 Gallons	N/A	N/A	7.38
1" Meter (Residential & Commercial)			
Gallons Included in Minimum	-	-	-
Excess of Minimum - per 1,000 Gallons			
From 1 to 10,000 Gallons	\$ 2.83	N/A	N/A
Over 10,000 Gallons	4.18	N/A	N/A
From 1 to 3,000 Gallons	N/A	\$ 4.80	N/A

	Present Rates	Company Proposed Rates	Staff Recommended Rates
From 3,001 to 10,000 Gallons	N/A	5.80	N/A
Over 10,000 Gallons	N/A	6.75	N/A
From 1 to 18,000 Gallons	N/A	N/A	\$ 6.15
Over 18,000 Gallons	N/A	N/A	7.38
1½" Meter (Residential & Commercial)			
Gallons Included in Minimum	-	-	-
Excess of Minimum - per 1,000 Gallons			
From 1 to 10,000 Gallons	\$ 2.83	N/A	N/A
Over 10,000 Gallons	4.18	N/A	N/A
From 1 to 3,000 Gallons	N/A	\$ 4.80	N/A
From 3,001 to 10,000 Gallons	N/A	5.80	N/A
Over 10,000 Gallons	N/A	6.75	N/A
From 1 to 30,000 Gallons	N/A	N/A	\$ 6.15
Over 30,000 Gallons	N/A	N/A	7.38
2" Meter (Residential & Commercial)			
Gallons Included in Minimum	-	-	-
Excess of Minimum - per 1,000 Gallons			
From 1 to 10,000 Gallons	\$ 2.83	N/A	N/A
Over 10,000 Gallons	4.18	N/A	N/A
From 1 to 3,000 Gallons	N/A	\$ 4.80	N/A
From 3,001 to 10,000 Gallons	N/A	5.80	N/A
Over 10,000 Gallons	N/A	6.75	N/A
From 1 to 35,000 Gallons	N/A	N/A	\$ 6.15
Over 35,000 Gallons	N/A	N/A	7.38
3" Meter (Residential & Commercial)			
Gallons Included in Minimum	-	-	-
Excess of Minimum - per 1,000 Gallons			
From 1 to 10,000 Gallons	\$ 2.83	N/A	N/A
Over 10,000 Gallons	4.18	N/A	N/A
From 1 to 3,000 Gallons	N/A	\$ 4.80	N/A
From 3,001 to 10,000 Gallons	N/A	5.80	N/A
Over 10,000 Gallons	N/A	6.75	N/A
From 1 to 100,000 Gallons	N/A	N/A	\$ 6.15
Over 100,000 Gallons	N/A	N/A	7.38
4" Meter (Residential & Commercial)			
Gallons Included in Minimum	-	-	-
Excess of Minimum - per 1,000 Gallons			
From 1 to 133,000 Gallons	\$ 2.83	N/A	N/A
Over 133,000 Gallons	4.18	N/A	N/A
From 1 to 3,000 Gallons	N/A	\$ 4.80	N/A
From 3,001 to 10,000 Gallons	N/A	5.80	N/A
Over 10,000 Gallons	N/A	6.75	N/A
From 1 to 150,000 Gallons	N/A	N/A	\$ 6.15
Over 150,000 Gallons	N/A	N/A	7.38
6" Meter (Residential & Commercial)			
Gallons Included in Minimum	-	-	-
Excess of Minimum - per 1,000 Gallons			
From 1 to 267,000 Gallons	\$ 2.83	N/A	N/A
Over 267,000 Gallons	4.18	N/A	N/A
From 1 to 3,000 Gallons	N/A	\$ 4.80	N/A
From 3,001 to 10,000 Gallons	N/A	5.80	N/A
Over 10,000 Gallons	N/A	6.75	N/A
From 1 to 300,000 Gallons	N/A	N/A	\$ 6.15
Over 300,000 Gallons	N/A	N/A	7.38
Service Line and Meter Installation Charges			
5/8" Meter	\$ 400	\$ 450	\$ 450
3/4" Meter	400	475	475
1" Meter	500	550	550
1½" Meter	715	775	775
2" Meter	1,305	1,375	1,375
3" Meter	1,815	1,975	1,975
4" Meter	2,860	3,040	3,040
6" Meter	5,275	5,635	5,635

	Present Rates	Company Proposed Rates	Staff Recommended Rates
Service Charges			
Establishment	\$ 25.00	\$ 35.00	\$ 30.00
Establishment (After Hours)	30.00	45.00	40.00
Reconnection (Deliquent)	25.00	35.00	30.00
Reconnection (After Hours)	-	45.00	40.00
Meter Test	30.00	45.00	30.00
Deposit Requirement (Residential)	*	*	*
Deposit Requirement (None Residential Meter)	*	*	*
Deposit Interest	*	*	*
Re-Establishment (With-in 12 Months)	**	**	**
Re-Establishment (After Hours)	**	**	**
NSF Check	15.00	20.00	20.00
Deferred Payment, Per Month	1.5 % of Outstanding balance	1.5 % of Outstanding balance	1.5 % of Outstanding balance
Meter Re-Read	10.00	15.00	15.00
Charge of Moving Customer Meter - Customer Requested per Rule R14-2-405B	Cost	Cost	Cost

* Per Commission Rules (R14-2-403.B)

** Months off system times the minimum (R14-2-403.D)

In addition to the collection of regular rates, the utility will collect from its customers a proportionate share of any privilege, sales, use, and franchise tax. Per Commission Rule (14-2-409.D.5).

Typical Bill Analysis
General Service 5/8-inch Meter

Company Proposed	Gallons	Present Rates	Present Rates with Surcharges	Proposed or Recommended Rates	Dollar Increase without Surcharge	Dollar Increase with Surcharge	Percent Increase without Surcharge	Present Rate Increase with Surcharge
Average Usage	6,585	\$35.07	\$42.73	\$91.19	\$56.13	\$48.47	160.06%	113.44%
Median Usage	5,272	31.35	39.01	83.58	52.23	44.57	166.60%	114.25%
Staff Recommended								
Average Usage	6,585	\$35.07	\$42.73	\$63.35	\$28.28	\$20.62	80.66%	48.27%
Median Usage	5,272	31.35	39.01	55.27	23.92	16.26	76.31%	41.69%

Present & Proposed Rates (Without Taxes)
General Service 5/8-Inch Meter

Gallons Consumption	Present Rates	Company Proposed Rates	% Increase	Staff Recommended Rates	% Increase	% Staff increase with Surcharges
-	\$16.43	\$56.00	240.84%	\$29.00	76.51%	20.38%
1,000	19.26	60.80	215.68%	33.10	71.86%	22.96%
2,000	22.09	65.60	196.97%	37.20	68.40%	25.04%
3,000	24.92	70.40	182.50%	41.30	65.73%	26.76%
4,000	27.75	76.20	174.59%	47.45	70.99%	34.00%
5,000	30.58	82.00	168.15%	53.60	75.28%	40.17%
6,000	33.41	87.80	162.80%	59.75	78.84%	45.48%
7,000	36.24	93.60	158.28%	65.90	81.84%	50.11%
8,000	39.07	99.40	154.42%	72.05	84.41%	54.18%
9,000	41.90	105.20	151.07%	78.20	86.63%	57.79%
10,000	44.73	111.00	148.16%	85.58	91.33%	63.35%
11,000	48.91	117.75	140.75%	92.96	90.06%	64.33%
12,000	53.09	124.50	134.51%	100.34	89.00%	65.17%
13,000	57.27	131.25	129.18%	107.72	88.09%	65.90%
14,000	61.45	138.00	124.57%	115.10	87.31%	66.55%
15,000	65.63	144.75	120.55%	122.48	86.62%	67.12%
16,000	69.81	151.50	117.02%	129.86	86.02%	67.63%
17,000	73.99	158.25	113.88%	137.24	85.48%	68.08%
18,000	78.17	165.00	111.08%	144.62	85.01%	68.50%
19,000	82.35	171.75	108.56%	152.00	84.58%	68.87%
20,000	86.53	178.50	106.29%	159.38	84.19%	69.21%
25,000	107.43	212.25	97.57%	196.28	82.71%	70.54%
30,000	128.33	246.00	91.69%	233.18	81.70%	71.47%
35,000	149.23	279.75	87.46%	270.08	80.98%	72.15%
40,000	170.13	313.50	84.27%	306.98	80.44%	72.66%
45,000	191.03	347.25	81.78%	343.88	80.01%	73.07%
50,000	211.93	381.00	79.78%	380.78	79.67%	73.40%
75,000	316.43	549.75	73.74%	565.28	78.64%	74.42%
100,000	420.93	718.50	70.69%	749.78	78.12%	74.94%